

DEPARTMENT OF THE ARMY
HEADQUARTERS UNITED STATES ARMY INFANTRY CENTER
FORT BENNING, GEORGIA 31905-5000

REPLY TO
ATTENTION OF

ATZB-PWN-P (200)

27 NOV 00

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Fort Benning Hazardous Waste Management Plan

1. Fort Benning has updated its Hazardous Waste Management Plan to reflect new regulations, policy and guidance for the management of Hazardous Waste. The implementation of this plan is mandatory to ensure compliance with Federal, State, and Army regulations.
2. The Plan is in accordance with Army Regulation 200-1 and applicable Federal and State of Georgia environmental regulations. The plan assigns responsibility and provides instruction for appropriate waste handling and management to insure conformance with Army policy and Federal and State Hazardous Waste regulations.
3. This plan is applicable to all installation activities, tenant organizations, and contractors responsible for generating, accumulating, managing and responding to incidents and spills of hazardous waste within the boundaries of Fort Benning.
4. It is required that all organizations implement and comply with the provisions of the Fort Benning Hazardous Waste Management Plan at all times.
5. Point of contact is Wendy G. Duffy, Hazardous Waste Program Manager, DPW Environmental Programs Management Branch.

FOR THE COMMANDER:

[SIGNED]

JOSE A. TORRES
Colonel, Infantry
Garrison Commander

Encl

**DEPARTMENT OF THE ARMY
UNITED STATES INFANTRY TRAINING CENTER
Fort Benning, Georgia 31905**

Environmental Quality
INSTALLATION HAZARDOUS WASTE MANAGEMENT PLAN

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CHAPTER 1 INTRODUCTION

1-1. PURPOSE This plan addresses the mandatory requirements promulgated by the Resource Conservation and Recovery Act (RCRA) in Title 40, Code of Federal Regulations (CFR) Parts 260-270 and Part 273 for the management and disposal of hazardous wastes. It provides guidelines for safe handling of hazardous wastes from the point of generation where they become hazardous waste to ultimate disposal. This plan has been prepared in accordance with Army Regulation (AR) 200-1.

1-2. REFERENCES Related publications are listed at Appendix A.

1-3. ACRONYMS Acronyms used in this regulation are provided in Appendix N.

1-4. APPLICABILITY This plan applies to:

- a. All units and activities assigned, attached, conducting training, or stationed on Fort Benning as tenants.
- b. Contractor activities located on the Fort Benning military installation.
- c. Any person residing, visiting, or working within the limits of Fort Benning.

NOTE: In the event any of the provisions contained in this plan are superseded or otherwise modified by changes to the CFRs or the Georgia Hazardous Waste Management Rules and Solid Waste Management Law (Georgia Rules), the CFR and Georgia Law shall take precedence over this plan.

1-5. HAZARDOUS WASTE MANAGEMENT PERMIT A Hazardous Waste Facility Permit No. HW-021 (S)-2 was issued on July 19, 1996 to the United States Army Infantry Center, Fort Benning, GA, to operate a hazardous waste storage facility located on Fort Benning in Chattahoochee County, on 10th Mountain Division Road. An Environmental Protection Agency (EPA) facility number of GA3210020084 was issued to Fort Benning for storage of hazardous waste. Copies of this permit are located in the Directorate of Public Works (DPW), Environmental Programs Management Branch (EPMB), and at the Defense Reutilization and Marketing Office (DRMO) on 10th Mountain Division Road. DRMO operates the permitted Treatment, Storage, and Disposal Facility (TSDF) for the Fort Benning Commander.

CHAPTER 2 RESPONSIBILITIES

2-1. GARRISON COMMANDER The Garrison Commander will:

- a. Establish an organizational structure to plan, execute, and monitor environmental programs.
- b. Serve as the chairman of the Environmental Quality Control Committee (EQCC). Each Major Subordinate Command (MSC) shall provide a representative to the EQCC.
- c. Provide oversight to Environmental Programs pursuant to AR 200-1.
- d. Serve as the "owner" of the Permitted TSDF and the Installation.
- e. Sign permits, permit modifications, and renewals for regulatory authorities as the facility owner.
- f. Ensure that DPW has adequate resources to carry out its Hazardous Waste Management functions and responsibilities.
- g. Ensure that all Hazardous Waste Handlers comply with the Federal, State, and Local regulatory requirements for hazardous waste management.
- h. Require appointment and training of Environmental Compliance Officers (ECOs) at appropriate organizational levels for all subordinate organizations to ensure required compliance actions take place.
- i. Require all tenant commanders to designate Environmental Compliance Officers.

2-2. ENVIRONMENTAL QUALITY CONTROL COMMITTEE The EQCC, as mandated under AR 200-1 will:

- a. Meet at least quarterly.
- b. Act on the broad range of environmental issues covered in AR 200-1.
- c. Appoint the Hazardous Waste Management Board to serve as a subcommittee of the EQCC.
- d. Designate certain hazardous material as banned or restricted.
- e. Recommend hazardous waste minimization strategies that are economically practical.
- f. Recommend material management changes related to health, safety, or environmental considerations.

- g. Recommend updates to the Installation Hazardous Waste Management Plan (HWMP).
- h. Represented by all MSC on Fort Benning

2-3. DIRECTORATE OF PUBLIC WORKS The Director of Public Works (DPW) will:

- a. Serve as the Installation Hazardous Waste Manager.
- b. Delegate the responsibilities of the Hazardous Waste Manager to the EPMB.
- c. Develop, implement, and monitor the Installation HWMP
- d. Coordinate the submittal of all permits, manifests, audits, checklists, reports, plans, and payments of fees or fines as required by DOD, Federal, and State regulatory agencies.
- e. Coordinate all inspections of Fort Benning by Federal and State regulatory agencies.
- f. Report the status of ongoing hazardous material (HM)/hazardous waste (HW) actions to the EQCC.
- g. Provide input into the qualifications that potential HW contractors must possess to ensure compliance with environmental law.
- h. Provide technical assistance to ECOs for the management of HW activities.
- i. Develop and publish guidance for all activities and individuals managing hazardous waste. Guidance will pertain to classification of hazardous waste, safety precautions, packaging, labeling, storage, disposal requirements, and other responsibilities of HW managers (HWMs).
- j. Review the establishment, closure, or change in status of HW generation/accumulation sites.
- k. Identify all hazardous material handlers who might generate HW.
- l. Coordinate and oversee the Hazardous Waste Management Board. Prepare agendas and minutes, and schedule periodic meetings.
- m. Maintain liaisons with Federal and State offices.
- n. Serve as executive secretary of the EQCC.
- o. Program and budget for necessary funds and personnel in order to execute environmental programs and to comply with applicable Federal, State, and Local environmental regulations.

2-4. MAJOR UNIT/ACTIVITY COMMANDERS The commander of each major subordinate command (MSC), tenant unit, and civilian directorate will:

- a. Appoint in writing one Senior Environmental Compliance Officer (SECO) and one Environmental Coordinator (EC) at each brigade or regiment level unit, separate battalion, and directorate. The SECO will be a field grade officer or a GS-12 level or above civilian. The EC will be a senior noncommissioned officer (NCO) or a GS-7 level or above civilian.
- b. Appoint in writing at least one ECO and at least one EC at each company/division/branch level. The ECO will be an officer or warrant officer, a senior NCO, or a GS-7 level or above civilian. The EC will be a NCO or GS-7 level or above civilian. At the company/division/branch level the ECO and EC may be the same individual.
- c. Appoint in writing one Hazardous Waste Manager (HWM) (and one assistant HWM) for each HW accumulation area (Satellite Accumulation Point (SAP) and 90 Day Central Accumulation Point (CAP)). HWMs are worker-level individuals responsible for identifying, managing and disposing of waste generated from work sites.
- d. Personnel appointments will be for a period of at least 1-year. Commanders should consider longevity and continuity when making these appointments. These are essential personnel that will assist the Commander in achieving and maintaining complete environmental compliance.
- e. Identify and maintain an inventory of all wastes generated. Determine waste status (hazardous, non regulated, or solid waste) through generator knowledge, analytical testing, or a combination of both. Maintain all required documentation in accordance with guidance from the Installation Hazardous Waste Program Managers.
- f. Identify all HW handlers. Ensure that individuals, units, activities, or contractors in the chain of command who perform any HW function (including on-post transportation) comply with this plan and receive appropriate HW training.
- g. Ensure the SECOs, ECOs, ECs and HWMs are trained by EPMB personnel according to the Installation Hazardous Waste Training Plan. They will serve as liaisons between the DPW EPMB and their respective unit/activity.
- h. Ensure that the duties and responsibilities of each SECO, ECO, EC and HWM are incorporated in their official job description or orders according to the Installation HWMP.
- i. Ensure ECs provide and document on-the-job training, in addition to the required classroom training, for all personnel designated as HWMs, and any additional personnel handling HW.
- j. Ensure SECO, ECO, EC and HWM replacements have the requisite training and have assumed their specific duties prior to the departure of the SECO, ECO, EC or HWM they are replacing.

- k. Ensure that HW meets all DRMO requirements prior to being transferred for turn-in to the Central Hazardous Material Control Center (CHMCC) located at Building 377.
- l. Implement procedures to reduce associated HW costs and minimize waste generation whenever possible and feasible.
- m. Ensure that each unit/activity has a current unit/activity specific Environmental Management SOP reviewed by EPMB.
- n. Ensure that each unit/activity that generates/manages HW has a current Activity Specific Plan (ASP) for spill prevention and response. The ASP is the unit/location specific portion of the Integrated Contingency Plan for emergency response and is provided by EPMB to regulated units/organizations at Fort Benning.
- o. Estimate annual HW management costs (containers, labels, spill supplies, analytical testing, and disposal) and include in budget forecast.
- p. Fund all costs associated with the management, storage, disposal, and clean up of HW.
- q. Serve as a member of the Installation EQCC.
- r. Maintain accountability for and document the flow of HM/HW from the point of receipt to the point of turn-in for disposal. (e.g. "cradle to grave").
- s. Maintain current HW/HM inventories that reflect changes in operations and materials.
- t. Properly manage HM/HW as described in this plan.
- u. Provide the EPMB with the information necessary to prepare reports for local, State and Federal regulatory agencies, the Army and DOD to include a biannual update of SAP/CAP Locations (request for this information will be sent out 1 DEC and 1 MAY).
- v. Provide EPMB with notification of any changes in HW activities to include changes in SAPs/CAPs upon implementation.

2-5. DIRECTOR OF LOGISTICS The Director of Logistics (DOL) as a Supply Support Activity (SSA) will:

- a. Pursuant to AR 200-1, implement a hazardous material procurement and inventory control program.
- b. Monitor installation-wide use of hazardous material to ensure progress in meeting Federal and Army HW minimization goals and requirements, and provide quarterly progress reports to the DPW.
- c. On a semiannual basis, recommend opportunities and provide a progress report to the Garrison Commander in reducing the use and toxicity of hazardous material, following the concurrence of the DPW EPMB.
- d. Advise waste generating activities on proper requirements for packaging, labeling, and shipping of solid waste and hazardous waste.
- e. Actively support the DPW EPMB in measuring progress to meet Federal and Army waste reduction goals and requirements.
- f. Communicate regularly with the DLA activity serving the installation to maintain current information on markets for excess or unserviceable materials and solid and hazardous wastes.
- g. Block DOL customers' procurement of materials banned by the EQCC and the DPW EPMB. The EQCC and DPW will provide the national stock numbers of the banned materials.
- h. Serve as a member of the Installation EQCC.

2-6. DIRECTOR OF CONTRACTING The Director of Contracting (DOC) will:

Process and award requests for HW disposal requirements in accordance with the Federal Acquisition Regulation (FAR) and related regulations. This requirement applies only to HW than cannot be disposed by the DRMO. All contracts for HW disposal must be coordinated through and approved by the HW Program Manager, DPW EPMB.

2-7. DIRECTOR OF CIVILIAN PERSONNEL The Director of Civilian Personnel (DCP) will:

- a. Pursuant to AR 200-1 will support the DPW in providing worker education/training for individuals identified to work with hazardous materials.
- b. Fill vacancies in an expeditious manner to avoid non-compliance caused by lack of personnel.
- c. Ensure job descriptions are amended for all civilian employees affected by the Installation HWMP.

2-8. INFANTRY BRANCH SAFETY OFFICE The Infantry Branch Safety Office (IBSO) will:

- a. Provide safety training to all employees who will be exposed to hazardous materials.
- b. Provide guidance to HM users and handlers to meet OSHA's Hazard Communication (HAZCOM) requirements.
- c. Serve as a member of the Installation EQCC.
- d. Monitor the storage and packaging of HM and HW to ensure compliance with Federal, State, and Army safety regulations.

2-9. DEFENSE REUTILIZATION AND MARKETING OFFICE The Defense Reutilization and Marketing Office (DRMO) located on 10th Mountain Division Road will:

- a. Accept accountability for and possession of HW for disposal from Fort Benning activities (host, tenant, visiting, training units, and contractors). HW will be properly identified, contained, and labeled IAW AR 200-1, and 40 CFR 260-269.
- b. Provide and maintain a proper HW Treatment, Storage, and Disposal Facility (TSDF) IAW 40 CFR 264 STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES and Part B Permit No. HW-021 (S)-2 on file with the Environmental Protection Agency, Region IV office and the State of Georgia, Department of Natural Resources (DNR) Environmental Protection Division (EPD).
- c. Provide written and verbal guidance to generators on proper packaging of HW and completion of the DD Form 1348-1A.
- d. Prepare appropriate HW manifest documentation for determined HW, IAW Department of Transportation (DOT) and EPA requirements for transportation and disposal, respectively.
- e. Sign all HW manifests from DRMO as the Installation Commanders designated representative.
- f. Maintain all HW manifests, land-ban forms, and certificates of destruction for all HW leaving from the DRMO.
- g. Contract for sampling, analysis, pickup and HW disposal services pursuant to the requirements of DOD 4160.2.1-M Chapter XXI, and AR 200-1.
- h. Attempt to sell hazardous materials that are turned in to DRMO whenever possible to avoid costly disposal as a hazardous waste.
- i. Maintain records of analytical testing performed by DRMO agents.
- j. Accept accountability and possession for other regulated wastes (non-RCRA) which can not be disposed of in landfills, sanitary sewers, or incinerators according the rules of the State of Georgia.
- k. Maintain reference copies of DOD Manual 4160.2.1-M, Defense Utilization and Disposal, available. This manual provides detailed information on the responsibilities and functions of the DRMO.
- l. Inform the Fort Benning Fire Department of the average HW/HM inventory stored at the DRMO, annually.
- m. Arrange for shipments of HW from DOD off-post activities which abide by waste analysis requirements of the Part B permit. Shipments will meet all the requirements of 49 CFR and 40 CFR Part 263 Standards Applicable to Transporters of Hazardous Waste.
- n. Refuse to accept HW from non-DOD, off-post activities.
- o. Ensure that DRMO personnel are trained and receive proper job titles and job description to reflect HW duties according to the Installation Hazardous Waste Training Plan and pursuant to 40 CFR 264 Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities.
- p. Ensure adequate staffing at DRMO to allow for continuous acceptance and processing of hazardous waste.
- q. Ensure that inspections are conducted at least weekly and recorded on the DRMS Form 1713.
- r. Serve as a member of the Installation EQCC.

2-10. CENTRALIZED HAZARDOUS MATERIAL CONTROL CENTER The Centralized Hazardous Material control center (CHMCC) located in Building 377, 10th Mountain Division Road will:

- a. Use the Hazardous Substance Management System (HSMS) to provide centralized tracking and control of HM used on Fort Benning.
- b. Provide logistical support and related supply assistance to support customers ordering and receiving HM.
- c. Accept excess serviceable material and advertise it for free issue.
- d. Operate a 90-day HW central accumulation point (CAP) for customer turn-in of hazardous waste, and turn in HW to DRMO weekly.

2-11. INSTALLATION HAZARDOUS WASTE PROGRAM MANAGER The Installation Hazardous Waste Program Manager working for DPW EPMB will:

- a. Develop, implement, and monitor the Installation HWMP.
- b. Coordinate the submittal of all permits, manifests, audits, inspections, checklists, reports, plans, and payments of fees or fines as required by DOD, Federal, and State regulatory agencies concerning RCRA Subtitle C.
- c. Report the status of ongoing hazardous material and HW actions to the EQCC.
- d. Identify all hazardous material handlers who might generate hazardous waste. Maintain a current database of all the HW generators on Fort Benning.
- e. Assist ECOs in the management of HW activities in their appointed area.

- f. Develop and publish guidance for all activities and individuals handling or managing hazardous waste. Guidance will pertain to classification of hazardous waste, HW minimization, packaging, labeling, disposal requirements, and other responsibilities of HW management.
- g. Manage the HW Inspection Program. Document inspections according to the Installation Hazardous Waste Inspection Plan described in **Chapter 5**.
- h. Conduct periodic inspections verifying that HW generation sites, SAPs and CAPs are maintained in accordance with State and Federal environmental regulations.
- i. Assist generators to ensure that HW is properly packaged, marked, labeled and that the Hazardous Waste Profile Sheet HWPS (DRMS Form 1930) is completed correctly. (See example in Appendix B)
- j. Assist ECOs in providing on-the-job training for personnel involved with HW operations.
- k. Receive annual HW training.

2-12. SENIOR ENVIRONMENTAL COMPLIANCE OFFICER The Senior Environmental Compliance Officer (SECO) is assigned to manage the Commander's or Director's Environmental Program. The SECO serves as a liaison between DPW EPMB and the respective unit/activity. The SECO at Brigade, Regiment, Directorate or Battalion levels should be a Field Grade Officer or civilian equivalent. The SECO is responsible for maintaining environmental compliance with all Federal, State, and Fort Benning regulations and will:

- a. Serve as the Commander's/Director's representative for all environmental program issues.
- b. Coordinate with DPW EPMB for clarification and assistance.
- c. Provide support and direction to the Environmental Coordinator.
- d. Ensure personnel receive required training.
- e. Estimate annual HW disposal and management costs and include in budget forecast.
- f. Serve as a member of the Installation EQCC.
- g. Quarterly inspect HW generation areas, SAPs/CAPs.
- h. Ensure all required documents are prepared and maintained.
- i. Receive a one time, four (4) hour environmental training course upon appointment to SECO duty. The DPW EPMB's "Senior Environmental Compliance Officers Course" meets this requirement.

2-13. ENVIRONMENTAL COMPLIANCE OFFICER The Environmental Compliance Officer (ECO) is assigned to manage the company, civilian division or branch level Environmental Program. The ECO should be an officer, Senior NCO, GS, or WG level. The ECO will report to the organization SECO. The ECO is responsible for maintaining environmental compliance with all Federal, State, and Fort Benning regulations and will:

- a. Coordinate with the unit SECO, Environmental Coordinator (EC) and DPW EPMB for clarification and assistance.
- b. Provide support and direction to the EC.
- c. Ensure personnel receive required training.
- d. Estimate annual HW disposal and management costs and include in budget forecast.
- e. Inspect HW generation sites.
- f. Ensure all required documents are prepared and maintained.
- g. Receive eight (8) hour HW training initially and update training annually. The DPW EPMB "Hazardous Waste Managers Training Course" meets this requirement.

2-14. ENVIRONMENTAL COORDINATOR The ECs serve as liaisons between the DPW EPMB and their respective unit/activity. The EC should be a Senior NCO, GS or WG level. They are responsible for maintaining environmental compliance with all Federal, State, and Fort Benning regulations and will:

- a. Identify all HW handlers.
- b. Train the HW handlers in HW operations specific for the operations where they work.
- c. Incorporate the duties, responsibilities, and training of each handler and manager into his/her official personnel file.
- d. Provide and document on the job training to HWMs before they assume their duties.
- e. Report suggestions in the current operational system to the DPW EPMB so that improvements can be implemented.
- f. Inspect the HW SAPs and CAPs at least monthly and record them on the Hazardous Waste Site Inspection, FB (DPW) Form 46 or 49 (For CAPs only) (Appendix B).
- g. Take immediate appropriate action to correct identified deficiencies to ensure minimal adverse impact to the environment.

- h. Ensure each generation site manager has requisite annual training and records of this training are properly maintained for a minimum of 3 years.
- i. Ensure the spill response procedures are properly posted.
- j. Maintain all required documentation as specified in the Installation HWMP. Documentation should be maintained in an Environmental Management Book or Activity Specific Plan.
- k. Receive eight (8) hours of HW training initially and update annually. The DPW EPMB's "Hazardous Waste Managers Training Course" meets this requirement.

2-15. HWM: SATELLITE ACCUMULATION POINT (SAP) The HWM (HWM) at each SAP will:

- a. Identify waste streams as hazardous or nonhazardous waste.
- b. Manage all HW according to the Installation HWMP.
- c. Maintain MSDS for each hazardous material handled. Select and use proper PPE when handling waste.
- d. Respond to spills of hazardous materials/wastes in accordance with the unit Activity Specific Plan.
- e. Coordinate with the DPW EPMB to locate and establish the HW generation sites.
- f. Conduct weekly inspections of the SAP and record the results on the Hazardous Waste Site Inspection, FB Form 46 (see Appendix B).
- g. Order and maintain required contingency supplies.
- h. Complete documents required for turn in of waste to DRMO.
- i. Transport HW to the CHMCC, DRMO or an approved 90-day CAP.
- j. Maintain copies of documents required by the Installation HWMP and maintain for a minimum of 3 years.
- k. Receive eight (8) hours of HW training initially and updates annually. The DPW EPMB's "Hazardous Waste Managers Training Course" meets this requirement.

2-16. HWM: 90 DAY CENTRAL ACCUMULATION POINT (CAP) The HWM at each CAP will:

- a. Identify waste streams as hazardous or nonhazardous waste.
- b. Manage all HW according to the Installation HWMP.
- c. Maintain MSDS for each hazardous material handled that has the potential to become a hazardous waste.
- d. Select and use proper PPE when handling waste.
- e. Respond to spills of hazardous materials/wastes in accordance with the unit Activity Specific Plan.
- f. Coordinate with the DPW EPMB to locate and establish the CAP.
- g. Conduct weekly inspections of the CAP and record the results on the Hazardous Waste Site Inspection, FB Form 49 (Appendix B). Order and maintain required contingency supplies.
- h. Complete documents required for turn in of waste to the CHMCC or DRMO.
- i. Transport HW to the CHMCC within the 90-day limit. (Personnel transporting HW must have received HW training).
- j. Maintain copies of documents required by the Installation HWMP for a minimum of 3 years and maintain an Environmental Program Management Book.
- k. Receive eight (8) hours of HW training and annual update. The DPW EPMB's "Hazardous Waste Managers Training Course" will meet this requirement.

CHAPTER 3 HAZARDOUS WASTE IDENTIFICATION

3-1. INTRODUCTION HW are a subset of solid waste. A solid waste is any discarded material, which is abandoned, considered inherently waste-like, or used in a manner constituting disposal, or any material that can not be used for its intended purpose. Any person, who generates a solid waste, must determine if that waste is a HW using the following method. (Unit/activity personnel are encouraged to coordinate with DPW EPMB for assistance in completing the HW determination.

- a. Determine if the waste is excluded from regulation. Contact DPW EPMB Hazardous Waste Program Manager for assistance.
- b. Determine if the waste is a listed hazardous waste. Generally these are spent solvent wastes or expired/excess chemicals. Contact DPW EPMB Hazardous Waste Program Manager for assistance in making this determination.
- c. Determine if the waste exhibits any of the characteristics of HW (Ignitability, Corrosivity, Reactivity, or Toxicity) using one of the following methods:
 - 1) Testing the waste according to the methods in subpart C of 40 CFR. Use a 1348-1A to request analytical testing through the DRMO (Example provided in Appendix B). (Assistance in choosing required testing will be provided by EPMB.

- 2) Applying generator knowledge of the hazard characteristic of the waste using information on the MSDS for materials being used and knowledge of the process. Assistance will be provided by DPW EPMB.

3-2. HAZARDOUS WASTE EXCLUSIONS: The following solid wastes are not considered to be hazardous wastes, in accordance with 40 CFR 261.4, they are exempt from management as hazardous waste:

- a. Wastes generated from residential activities, known as Household Waste (includes wastes generated from single and multiple residences, hotels and motels, barracks, bunkhouses, ranger stations, crew quarters, campgrounds, picnic grounds and day-use recreation areas)
- b. Solid waste from the growing and harvesting of agricultural crops or the raising of animals including animal manure that is returned to the soil as fertilizer.
- c. Used chlorofluorocarbon refrigerants from totally enclosed heat transfer equipment, including mobile air conditioning systems, mobile refrigeration and commercial and industrial air conditioning and refrigeration systems that use chlorofluorocarbons as the heat transfer fluid in a refrigeration cycle, provided that the refrigerant is reclaimed for further use.
- d. Non-tern plated used oil filters that are not mixed with a listed HW if these oil filters have been gravity hot-drained using one of the following methods:
 - a. Puncturing the filter anti-drain back valve or the filter dome end and hot draining.
 - b. Hot-draining and crushing.
 - c. Dismantling and hot-draining.
 - d. Any other equivalent hot-draining method which will remove the oil.
- e. Used Oil defined as any oil that has been refined from crude oil, or any synthetic oil that has been used and as a result of such use is contaminated by physical or chemical impurities. Regulations for the management and recycling of Used Oil are found in 40 CFR Part 279.

3-3. HAZARDOUS WASTE CHARACTERISTICS The Federal Regulation states that a waste that meets one of the following characteristics as defined below, is a Hazardous Waste.

a. **Ignitability** - EPA HW Number **D001**

- 1) A liquid with a flash point less than 140 degrees Fahrenheit. (Examples include, denatured alcohol, oil-based paints and thinners). This information can usually be found on the MSDS for the material.
- 2) A non-liquid which under normal conditions is capable of spontaneous and sustained combustion. (Example – white phosphorous)
- 3) An ignitable compressed gas (Example – acetylene)
- 4) An oxidizer (Example – calcium hypochlorite)

b. **Corrosivity** - EPA HW Number **D002**

- a. An aqueous solution with a Ph less than or equal to 2 or greater than or equal to 12.5. This information should be on the MSDS for the material.
- b. A liquid which corrodes steel at a rate greater than 1/4 inch per year

c. **Reactivity** - EPA HW Number of **D003**

- 1) Normally unstable and readily undergoes violent change without detonating.
- 2) Reacts violently with water. (Example – lithium in batteries)
- 3) Forms potentially explosive mixtures with water.
- 4) When mixed with water, generates toxic gases, vapors, or fumes (Example – MRE heaters)
- 5) Cyanide or sulfide bearing wastes which, when exposed to Ph conditions between 2 and 12.5 can generate toxic gases, vapors, or fumes in a quantity sufficient to present a danger to human health or the environment.
- 6) It is capable of detonation or explosive decomposition or reaction at standard temperature and pressure. (Example – gun powder)
- 7) It is readily capable of detonation or explosive decomposition if it is heated under confinement. (Example – aerosol cans)
- 8) It is a forbidden explosive, a Class A explosive, or a Class B explosive as defined in 49 CFR part 173

- a. **Toxicity** - **D004-D043** - A waste exhibits the characteristic of toxicity if the waste contains any of the contaminants listed in **Table 3-1** (on the following page) at a concentration equal to or greater than the value given in the table. An MSDS will provide information as to whether the products making up a waste contain any of the toxic chemicals listed below. The Toxicity Characteristic Leaching Procedure (TCLP) is used to conduct chemical analysis to determine whether a waste meets the toxicity concentration limits.

3-4. HAZARDOUS WASTES FROM NONSPECIFIC SOURCES (F-LISTED) HW from nonspecific sources are known as F-listed wastes. These hazardous wastes are generated by specific industrial operations. Refer to 40 CFR 261.31 for a specific listing. Common F-listed wastes found at Fort Benning are generated from degreasing, chemical cleaning and painting operations using solvents or thinners. Listed wastes also include rags used in degreasing or painting operations that are contaminated with the solvents. Common F-Listed solvents include: 1,1,1 trichloroethane, xylene, acetone, MIBK, methyl ethyl ketone (MEK), and methanol.

3-5. HAZARDOUS WASTES FROM SPECIFIC SOURCES (K-LISTED) Wastes from specific sources are known as K-listed hazardous wastes. These hazardous wastes are generated by specific manufacturing operations. Refer to 40 CFR 261.32 for a specific listing. Fort Benning does not currently generate any K-listed wastes.

3-6. ACUTELY TOXIC COMMERCIAL CHEMICAL PRODUCTS (P-LISTED) Commercial chemical products, residue remaining in the containers, or contaminated soil, water or other debris resulting from the cleanup of a spill that has the major ingredient or sole active ingredient listed in 40 CFR 261.33(e) are identified as acutely toxic HW and carry the associated EPA HW Number. Very few P-listed wastes are generated at Fort Benning, usually found as expired shelf life products such as some rat poisons containing Warfarin and medical supplies containing Epinephrine.

3-7. COMMERCIAL CHEMICAL PRODUCTS (U-LISTED) Commercial chemical products, residue remaining in the containers, or contaminated soil, water or other debris resulting from the cleanup of a spill that has the major ingredient listed or the sole active ingredient listed in 40 CFR 261.33(f) are identified as toxic HW and carry the associated EPA HW Number. Lindane powder is one example of a U-listed waste generated at Fort Benning.

TABLE 3-1, TOXIC HAZARDOUS WASTE EPA HW NUMBERS		
EPA HW Number	CONTAMINANT	REGULATORY LEVEL (mg/l)
D004	ARSENIC	5.0
D005	BARIUM	100.0
D018	BENZENE	0.5
D006	CADMIUM	1.0
D019	CARBON TETRACHLORIDE	0.5
D020	CHLORDANE	0.03
D021	CHLOROBENZENE	100.0
D022	CHLOROFORM	6.0
D007	CHROMIUM	5.0
D023	o-CRESOL	200.0
D024	m-CRESOL	200.0
D025	P-CRESOL	200.0
D026	CRESOL	200.0
D016	2,4-D	10.0
D027	1,4-DICHLOROBENZENE	7.5
D028	1,2-DICHLOROETHANE	0.5
D029	1,1-DICHLOROETHYLENE	0.7
D030	2,4-DINITROTOLUENE	0.13
D012	ENDRIN	0.02
D031	HEPTACHLOR (and its epoxide)	0.008
D032	HEXACHLOROBENZENE	0.13
D033	HEXACHLOROBUTADIENE	0.5
D034	HEXACHLOROETHANE	3.0
D008	LEAD	5.0
D013	LINDANE	0.4
D009	MERCURY	0.2
D014	METHOXYCHLOR	10.0
D035	METHYL ETHYL KETONE	200.0
D036	NITROBENZENE	2.0
D037	PENTACHLOROPHENOL	100.0

D038	PYRIDINE	5.0
D010	SELENIUM	1.0
D011	SILVER	5.0
D039	TETRACHLOROETHYLENE	0.7
D015	TOXAPHENE	0.5
D040	TRICHLOROETHYLENE	0.5
D041	2,4,5-TRICHLOROPHENOL	400.0
D042	2,4,6-TRICHLOROPHENOL	2.0
D017	2,4,5-TP (Silvex)	1.0
D043	VINYL CHLORIDE	0.2

3-8. INSTALLATION WASTE ANALYSIS PLAN This section provides guidance to ensure a proper waste determination containing the chemical and physical information about any waste is conducted before the waste is transferred to DRMO

3-8.1. Characterization A waste stream characterization or determination will be conducted upon initial generation of all wastes and when a change occurs in the process generating the waste. If no change occurs in the process the waste stream may be re-certified annually by completing a new waste profile sheet and attaching the supporting documentation (MSDS or initial analytical test results). Testing should be conducted through the DRMO contract using a DD Form 1348-1A (See Example in Appendix B). Analytical testing of waste streams should be updated every three years. Contact the EMD HW Program Manager for guidance to determine the correct analyses required for each waste type and for assistance in completing the 1348-1A. Each new waste type will be analyzed and profiled as it is generated. Generators are responsible for funding all analytical testing. The ECO or EC will maintain all documentation for the waste characterization for a period of three years.

TYPICALLY GENERATED WASTES THAT MAY REQUIRE ANALYTICAL TESTING TO CHARACTERIZE:

USED ANTIFREEZE -- test for TCLP Metals
 SLUDGE FROM HOT WATER PARTS WASHERS -- test for TCLP Metals
 SOLVENT FROM WEAPONS CLEANING VATS -- test for TCLP Metals and flashpoint
 FILTERS FROM WEAPONS CLEANING VATS -- test for TCLP Metals and flashpoint
 PATCHES AND SWABS FROM WEAPONS CLEANING -- test for Lead
 FILTERS FROM AEROSOL CAN DEPLETERS -- test for TCLP Volatiles and Semi-Volatiles
 SOLVENT FROM PARTS WASHERS --- test for TCLP Metals and flashpoint
 RAGS FROM MAINTENANCE OPERATIONS -- consult EPMB
 RAGS FROM PAINT OPERATIONS -- consult EPMB
 DRY SWEEP FROM MAINTENANCE OPERATIONS -- consult EPMB
 BLASTING MEDIA FROM PAINT REMOVAL OPERATIONS -- test for TCLP Metals

3-8.2. Unknown Wastes Containers of unknown waste except for Investigation Derived Waste (IDW) will be treated as HW until test results prove otherwise. A container of unknown waste will be labeled with a yellow and red HW label. All information required on the label will be completed with guidance from the EPMB HW Program Manager. The accumulation start date is the date the container is discovered. Testing will be requested from DRMO immediately. These containers will be stored in a CAP until test results are received. The date testing was requested, samples taken, and results expected should be written on the container. Requesting and funding of analyses and disposal are the responsibility of the units or activities assigned to the area where waste is discovered.

3-8.3. Analytical Service Contract DRMO manages the analytical services contract. When a container requires analytical testing prior to disposal, the generating unit will contact the DPW EPMB HW Program Manager for guidance on testing requirements. The requesting unit will provide a completed 1348-1 and certified funds for conducting the sampling and analysis. DRMO will oversee the contract and assist in:

- Coordinating collection of samples.
- Forwarding samples to the analytical laboratory.
- Receive the analytical results and forward them to DPW EPMB.

DPW EPMB will provide waste management guidance and disposal requirements to the generator based on the test results.

3-8.4. Disposal When the analysis indicates hazardous characteristics, the container will be processed through the CHMCC for disposal. The analysis results and a waste profile (DRMS Form 1930) will accompany the DD Form 1348-1A. The EC and the HWM will keep a copy of the analysis results, waste profile and 1348-1 on file for a minimum of three years.

CHAPTER 4 HAZARDOUS WASTE ACCUMULATION POINT MANAGEMENT

4.1. SATELLITE ACCUMULATION POINTS (SAPs) HW generators may accumulate up to 55 gallons of HW or one quart of acutely HW in containers at or near the point of initial generation, (SAP) provided the following requirements are met. Once 55 gallons is accumulated, the generator has 3 consecutive calendar days (72 Hours) to remove the waste from the SAP to a CAP or the CHMCC. Full containers less than 55 gallons that have been closed for the last time must also be removed from the SAP to a CAP or CHMCC within 72 hours. The location, type and quantity of waste being accumulated must be reported to DPW EPMB, HW Program Manager. The unit EC ensures that the administration, personnel training, storage management, and container management are conducted in accordance with this plan. All SAP management and inspection activities are the direct responsibility of the appointed HWM.

a. Administrative Requirements

- 1) Inspections will be conducted weekly by the HWM and monthly by the EC. Inspections must be documented on the Hazardous Waste Site Inspection Form, FB (DPW) Form 46 (example provided in Appendix B) or an equivalent form approved by DPW EPMB. Instructions for completing FB (DPW) Form 46 are included in Appendix B. **Inspection results will be kept on site for 3 years.**
- 2) Copies of DA 1348-1A turn-in documents will be maintained on file for 3 years by the EC and HWM (Example provided in Appendix B).
- 3) A current copy of the Fort Benning HWMP will be kept on site.
- 4) The Activity Specific Plan for spill prevention and response be kept at each SAP facility. A copy of the Installation Spill Contingency Plan (ISCP) must also be maintained at the facility.
- 5) Spill response and reporting procedures must be posted near the SAP and areas where HM/HW are handled.
- 6) Each unit/activity should maintain an Environmental Management Standard Operating Procedure (SOP) that addresses HW and SAP management.
- 7) A unit specific evacuation map must be posted.
- 8) Material Safety Data Sheets (MSDSs) for all hazardous materials will be available in the work area to all employees.
- 9) A current inventory of all hazardous materials stored at in the unit will be maintained on the Hazardous Material Inventory List, FB (DPW) Form 47 (or equivalent) see Appendix B.
- 10) A Hazardous Waste Inventory FB Form 48, (see Appendix B) will be completed for waste accumulated in the SAP to provide tracking documentation of the waste through turn-in to a CAP, CHMCC or DRMO. This form will be maintained on file for 3 years by the HWM.
- 11) A HW determination utilizing process knowledge, MSDS, and/or analytical testing will be conducted for all waste streams generated.
- 12) A record of test results, inspections, waste analyses, and waste determination information will be kept for 3 years by the HWM.
- 13) Appointment orders containing job titles for each HWM, EC, ECO, and SECO will be on file with the EC and HWM.
- 14) Copies of training certificates for appointed personnel will be maintained by the unit/activity.
- 15) A person trained in HW management procedures will direct the unit level training program.
- 16) New HWMs will receive training within 3 months of their appointment. At a minimum, the training will be the 8-hour HWMs class conducted by the DPW EPMB. Employees will not work unsupervised until training is completed.

b. SAP Management.

- 1) A sign containing the words "Hazardous Waste Satellite Accumulation Point" will be posted to designate the location of the SAP. The sign must include a description of the waste accumulated in the SAP such as "Waste Paint". A completed label should also be posted on the sign as an example. Total waste accumulation capacity at each SAP must not exceed 55 gallons.
- 2) The SAP will be at or near the point of HW generation.
- 3) The SAP will be under the control of the operator of the waste generating process (appointed HWM).

- 4) SAPs, where containers of liquid hazardous wastes are accumulated, will have a containment system with sufficient capacity to contain 10% of the volume of all containers, or the volume of the largest container, whichever is greater. Individual plastic drum coffins or a spill pallet may be used for SAPs.
- 5) SAP areas, if enclosed, will be provided with adequate ventilation and lighting.
- 6) SAP areas will not be located near any drainage system unless the potential for spills is mitigated (e.g. floor drain, sanitary sewage drain, storm drain, wash rack, oil/water separator).
- 7) SAP areas will have proper fire/safety equipment. An appropriate fire extinguisher will be maintained within 50 feet of the area.
- 8) SAP areas will have adequate spill absorbent material and equipment (shovel, broom, scoop, pan, etc.) located at each area.
- 9) SAPs will have provisions to prevent mixing of waste types.
- 10) SAPs will have proper aisle space to allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment.
- 11) The Environmental Point of Contact (POC) Poster (Appendix C) will be posted in the SAP.

c. Container Management

- 1) HW containers must be maintained in good condition, must meet Department of Transportation shipping requirements as set forth in 49 CFR Parts 172 and 173, and must be compatible with the waste stored in them. If the containers are steel drums, they must be free of dents and rust. Contact the DPW EPMB HWM for guidance pertaining to proper container selection for specific types of waste. (Containers may include open or closed head steel or plastic drums, wood, cardboard, plastic or metal boxes, fiber drums or plastic or steel jerricans.)
- 2) The containers will be kept closed except when waste is being added or removed.
- 3) Containers accumulating **HW** will be labeled with the regulation yellow and red "HAZARDOUS WASTE" label (see example in Appendix C). This label will be completed in accordance with the guidance contained in Appendix C and must include the following information:
 - Unit name and address.
 - Fort Benning's EPA ID No. (GA3210020084)
 - Department of Transportation (DOT) shipping name
 - EPA HW Code
 - Accumulation Start Date (**The date when the drum has been filled or closed for the last time.**)
- 4) Containers of highly flammable hazardous wastes will be grounded. Contact Safety for further guidance.
- 5) The containers will be transferred to a CAP, the CHMCC or DRMO within three calendar days (72 hours) after reaching the 55-gallon limit or when container is closed for the last time. **NO MORE THAN 55 GALLONS TOTAL OF HW (OR 1 QUART OF ACUTELY HAZARDOUS WASTE) MAY BE IN A SAP FOR LONGER THAN 3 DAYS.** The intent of the SAP is for temporary accumulation of HW. Turn-in procedures should be initiated well in advance of reaching the 55-gallon limit.
- 6) Containers accumulating non-regulated/non-hazardous waste will be marked with a description of the contents or labeled the blue or green labels (see examples in Appendix C). Non-Hazardous wastes will not be accumulated in a SAP and should be clearly segregated from HW.
- 7) Containers of unknown waste must transferred to a CAP and will be treated as HW until test results are received. See Section 10-6.2 Orphan Dump Sites, for further guidance.

4.2. 90-DAY CENTRAL ACCUMULATION POINTS (CAPs) CAPs are areas where HW can be stored temporarily for up to 90 days before transporting to the CHMCC or DRMO storage facility. The Environmental Coordinator (EC) ensures that the administration, personnel training, storage management, and container management are conducted in accordance with this plan. CAP management and inspection is the direct responsibility of the respective appointed HWM.

a. Administrative Requirements

- 1) The location of all CAPs will be reported to the DPW EPMB prior to operation, closure and any proposed modifications.
- 2) Inspections will be conducted weekly by the HWM and Monthly by the EC and recorded on the Hazardous Waste Site Inspection Form, FB (DPW) Form 49 (example provided in Appendix B). Instructions for completing FB (DPW) Form 49 are also included in Appendix B. **Inspection results must be maintained on site for 3 years.**
- 3) Copies of DA Form 1348-1A (HW turn in documents) will be maintained on file for 3 years by the EC. (Example provided in Appendix B)
- 4) A current copy of the Fort Benning HWMP will be kept on site.

- 5) The Activity Specific Plan and ISCP, provided by EPMB, for spill prevention and response will be maintained at the site.
- 6) A site specific Contingency Plan, as described in Section 10-2 of this plan, will be developed and maintained at each CAP.
- 7) A unit Environmental Management Standard Operating Procedure (SOP) will be developed and maintained at each CAP. DPW EPMB will review and approve the plan.
- 8) A site specific evacuation map must be available.
- 9) Spill response and notification procedures must be posted in the CAP.
- 10) A Hazardous Waste Inventory FB (DPW) Form 48, (Example in Appendix B) will be completed and maintained to track all wastes incoming and outgoing from the CAP. This form will be maintained on file for a minimum of 3 years by the EC.
- 11) A HW determination using process knowledge, MSDS and/or analytical data will be conducted and documented for all wastes generated.
- 12) A record of test results, inspections, waste analyses, and waste determinations will be kept for a minimum of 3 years by the EC.
- 13) A closure plan for the CAP will be drafted and available upon request.
- 14) Appointment orders containing Job titles for each HWM, EC, ECO, and SECO will be on file with the EC.
- 15) Copies of training certificates for appointed personnel will available and maintained for a minimum of 3 years.
- 16) New HWMs will receive training within 3 months of their appointment. At a minimum the training will be the 8-hour HWMs class conducted by the DPW EPMB.
- 17) Employees will not work unsupervised until training is completed.

b. CAP Management

- 1) A sign containing the words "Hazardous Waste Central Accumulation Point" will be posted to designate the location of the CAP.
- 2) CAPs accumulating containers of liquid HW will have a containment system with sufficient capacity to contain 10% of the volume of all containers or the volume of the largest container, whichever is greater.
- 3) CAPs will be provided with adequate ventilation and lighting.
- 4) CAPs will not be located near any drainage system (e.g. floor drains, sanitary sewage drains, storm drains, washracks, or oil/water separators).
- 5) CAPs will have proper fire/safety equipment. An appropriate fire extinguisher will be maintained within 50 feet of area.
- 6) CAPs will have spill absorbent material and equipment (shovel, broom, scoop, pan, etc.) located at each site.
- 7) CAPs for containers of HW will be inspected weekly for container leaks or deterioration of the container due to corrosion or other factors. Results must be documented on FB (DPW) Form 49 (Appendix B)
- 8) CAPs will have provisions for security. The security provisions will prevent unknowing entry and will not be readily accessible by unauthorized personnel. A communications system must be available at a CAP to call for immediate assistance in case of emergency. Communication equipment may include two way radio, cell phone or if near a work area an alarm or air horn to alert nearby personnel.
- 9) CAPs will have proper aisle space to allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment.

c. Container Management.

- 1) HW containers must be maintained in good condition, must meet Department of Transportation shipping requirements as set forth in 49 CFR Parts 172 and 173, and must be compatible with the waste stored in them. If the containers are steel drums, they must be free of dents and rust. Contact the EPMB HWM for guidance pertaining to proper container selection for specific types of waste. (Containers may include open head or closed head steel or plastic drums, wood, cardboard, plastic or metal boxes, fiber drums or plastic or steel jerricans.)
- 2) The containers will be kept closed except when waste is being added or removed.
- 3) Containers accumulating **HW** will be labeled with the regulation yellow and red "HAZARDOUS WASTE" label (see example in Appendix C). This label will be completed in accordance with the guidance contained in Appendix C and must include the following information:
 - Unit name and address.
 - Fort Benning's EPA ID No. (GA3210020084)
 - Department of Transportation (DOT) shipping name
 - EPA HW Code

- Accumulation Start Date
- 4) The accumulation start date will be marked on the container label **immediately when the first drop of waste is placed in the container or when the container is first placed in the CAP.** (If HW is transferred from a SAP to a CAP, the accumulation start date inscribed on the label in the SAP will remain the correct accumulation start date for the CAP).
- 5) **Containers must be turned in to the CHMCC within 60 days of the Accumulation Start Date (initial placement in CAP).**
- 6) Containers of unknown waste, will be treated as HW until test results are received. A container of unknown waste will be labeled with a yellow and red HW label. All information required on the label will be completed using guidance provided by the EPMB. The accumulation start date is the date the container is discovered. Testing will be requested from DRMO immediately. These containers must be stored in a CAP until test results are received. The date testing was requested, samples taken, and results expected should be written on the container.

CHAPTER 5 INSTALLATION HAZARDOUS WASTE INSPECTION PLAN

5-1. Satellite Accumulation Points The HWM for each SAP will conduct weekly inspections of the SAP. Inspections will be recorded on FB (DPW) Form 46 (Appendix B). If inspections reveal any noncompliance, the HWM will take immediate action to correct the deficiencies.

5-2. Central Accumulation Points The HWMs for CAPs will conduct weekly inspections of the 90 Day Accumulation Sites. Inspections will be recorded on FB (DPW) Form 49 (Appendix B). If inspections reveal any noncompliance, the HWM will take immediate action to correct the deficiencies.

5-3. ENVIRONMENTAL COORDINATORS (EC) The ECs will conduct monthly inspections of all SAPs and CAPs in their Unit/Activity. Inspections will be recorded on FB (DPW) Form 46 or 49, as applicable (Appendix B). If inspections reveal any noncompliance, the EC will take immediate action to correct the deficiencies.

5-4. DPW ENVIRONMENTAL PROGRAMS MANAGEMENT BRANCH The DPW EPMB will:

- a. Conduct courtesy HW inspections at the request of a unit or activity, or at a minimum once per year.
 - 1) These inspections will be recorded on FB (DPW) Form 46/49 and documented with a Memorandum for Record.
 - 2) Copies of the memorandum will be furnished to the unit/activity environmental representative requesting the inspection.
- b. At least once per year conduct random unannounced HW inspections of all active HW generation sites.
 - 1) Record the inspection on the Environmental Compliance Checklist, FB (DPW) Form 46/49
 - 2) Report the inspection results to the commander with a formal memorandum from the DPW.
 - 3) Immediately report any non-compliance to the SECO.
 - 4) Assist the unit with specific guidance required to obtain environmental compliance.
 - 5) Re-inspect the unit to verify environmental compliance.

CHAPTER 6 HAZARDOUS WASTE TURN-IN PROCEDURES AND TRANSPORTATION

6-1. HAZARDOUS WASTE TURN-IN Once the EC or HWM has declared a product a waste, the generator will properly accumulate this waste in a SAP or CAP. Once the container is full or closed for the last time, the waste will be turned in to the CHMCC or DRMO in accordance with procedures listed below.

6-2. DOCUMENTATION OF HAZARDOUS WASTE TURN-IN Proper documentation will be completed prior to the transportation of any wastes. The generating unit will be responsible for completing the DD Form 1348-1A, providing the MSDS or analytical test results, and a waste profile sheet (DRMS Form 1930). The generating unit will package the item in the proper container and ensure that labeling is completed. If drums or containers are not in good condition, the generating unit will be responsible for purchasing overpacks or repackaging the waste. **All costs associated with waste generation, storage, management, turn-in, and disposal will be provided by the generating unit.**

6-3. PROCEDURES FOR TURN-IN OF HAZARDOUS WASTE:

- a. The DRMO is responsible for disposal, marketing, and determining the marketability of all DOD-owned solid and hazardous materials. Any request to dispose of HW outside DRMS channels will be elevated to HQDA. All requests for exception to policy must specifically state that contracting and disposal criteria to be used are at least as stringent as those used by DRMS.
- b. All HW generated at Fort Benning will be turned in to the CHMCC. The CHMCC will then turn the HW in to DRMO for removal from the site by the DRMO contract. The only exception is contractor generated HW which, is manifested off post by a licensed HW transporter at the expense of the contractor.
- c. Prepare a separate DD Form 1348-1A turn-in document for each type of waste being turned in to the CHMCC. (See Appendix B for example or contact DRMO, EPMB or CHMCC for assistance). Attach a copy of the MSDS associated with the waste or a copy of any analytical test results for the waste. Contact the EPMB for completion of a Hazardous Waste Profile Sheet (DRMS Form 1930).
- d. The generating unit will supply the MSDS for the product. MSDS will be maintained at the work place at all times. MSDS, can be obtained from the IBSO, CHMCC, or EPMB. Generators MUST provide the NSN and manufacturer's name for the product to facilitate the MSDS search.
- e. Hazardous Waste Profile Sheet (DRMS Form 1930). The Hazardous Waste Profile Sheet will be completed by the EPMB, but must be signed by the generating unit to certify that the information provided is correct. Requests for Hazardous Waste Profile Sheets should be completed upon generation of a new waste stream. When testing is requested through the DRMO contract, test results are sent to the EPMB for review. EPMB will contact the generator when results are received.
- f. Obtain an accurate weight of the HW container and mark this on the DD Form 1348-1. An appointment must be made with the CHMCC to weigh the containers if the generating unit does not have access to scales. Disposal costs of HW are based on weight and the Contract Line Item Number (CLIN) which specifies the type of HW and the per pound cost. Once the weight has been determined, EPMB, CHMCC or DRMO can provide assistance in determining the correct CLIN and cost for the HW.
- g. The unit HWM will be responsible for completing the DD Form 1348-1A
- h. Once the weight, CLIN and cost are determined, a Fund Cite certifying funds must be provided by the respective unit budget organization. The fund cite and document number must match for tracking purposes. The CHMCC or DRMO will not accept incomplete, incorrect, or inaccurate 1348-1A's. Any questions concerning the 1348-1A completion procedure should be directed to the DRMO.
- i. The HWM will be responsible for ensuring the HW is properly packaged, labeled, and all documents completed.
- j. Packaging - HW must be packaged in DOT approved containers. The type of container required is dependent upon the characteristics of the waste. Contact the EPMB, CHMCC, or DRMO for assistance in determining the proper type of packaging required.
- k. Labeling - Containers accumulating HW must be labeled with a fully completed yellow and red HW label (sample in Appendix B) to include the accumulation start date.
- l. Make an appointment with DRMO (545-6027) to have documents checked for completeness and accuracy prior to turn in.
- m. Make an appointment for turn in at the CHMCC (545-9837 or 9838).
- n. If the HW can be transported safely, take it and the completed 1348-1A (original and five copies, signed by the activity supply and with funds certification) to the CHMCC at the pre-appointed time and turn in the HW.
- o. CHMCC will provide a carbon copy of the 1348-1A. Return the carbon copy/receipt to the unit activity supply or budget office. Keep one copy or make a copy for the HWM's records. DRMO must receive 4 copies of the 1348-1A.

6-4. TURN IN/DISPOSAL OF SPECIAL HAZARDOUS WASTES AND OTHER REGULATED ITEMS

- a. **Nuclear, Biological and Chemical (NBC) related equipment/supplies**, including mask filters, decontamination kits, chemical detection supplies, excess DS-2 and excess STB, contact DRMO or EPMB for guidance.
- b. **Scrap metal** is non-hazardous solid waste and will be turned in to DRMO using a 1348-1A.
- c. **Rags, contaminated with oil and grease**, can be managed in accordance with the guidance memorandum in Appendix E as a non-hazardous waste. Rags contaminated with solvent or paint must be characterized to determine if a HW.
- d. **Used dry sweep contaminated with oil and grease** can be managed in accordance with the guidance memorandum in Appendix E as a non-hazardous waste. Dry sweep contaminated with solvent, fuel, or paint will require waste stream analysis to determine if the dry sweep is a HW.
- e. **Oil Filters and Fuel Filters**: Metal oil filters will be thoroughly drained and crushed and can be managed in accordance with the guidance memorandum in Appendix E as a non-hazardous waste. Paper or cloth fuel

filters must be containerized and require a waste stream analysis to determine if the filters are a HW. Terne plated filters will be containerized and turned in to DRMO as a hazardous waste characteristic for lead.

- f. **Spill residue** will be properly containerized and disposed of using the characteristics of the spilled material (contact EPMB for guidance).
- g. **Partially used cans of paint** will be kept in tightly sealed containers for future use. Unusable oil based paint will be turned in to DRMO as a HW. Unusable latex paint will be turned into DRMO as a non-regulated waste. Chemical Agent Resistant Coating (CARC) paints are HW when unusable. An MSDS will accompany each different stock number and type of paint turned in. THE BEST MANAGEMENT METHOD FOR EXCESS PAINT IS TO USE IT.
- h. **Batteries** are considered Universal Waste and must be managed in accordance with guidance provided in Appendix F. For additional management and disposal information for lead-acid, lithium, mercury, magnesium, alkaline, and nickel-cadmium batteries contact DPW EPMB.
- i. **Florescent light tubes** with a green tip or green writing are non-hazardous and can be disposed of as garbage. Fluorescent light tubes that do not have green writing on them are considered a Universal Waste and must be accumulated in a sealed box labeled as "Used Fluorescent Bulbs". See Appendix G for proper waste management guidance.
- j. **Empty Containers** are considered empty when they meet all of the following criteria as defined in 40 CFR 261.7.
 - All wastes have been removed that can be removed using normal practical means. (Pouring, pumping, scraping)
 - There is no more than one-inch of residue remaining on the bottom of the container.
 - There is no more than 3 percent by weight of the total capacity of the container.
 - Empty Paint Containers may be allowed to dry with the lid off. Empty dried paint containers are then disposed of through DRMO as "metals for recycle."
 - Empty Containers from products other than POLs will NOT be drained over oil/water separators or washracks. Empty containers SHALL NOT BE DRAINED OVER STORM DRAINS, SEWAGE DRAINS, OR OPEN GULLIES.
 - Empty Containers that are going to be reused by the activity will have an "EMPTY" label affixed to them after they have been properly emptied and cleaned.
- k. **Depleted Empty Aerosol Cans** that have been properly drained and punctured (using the correct safety procedures and equipment manufactured for this use) will be turned in to DRMO as scrap metal. Contact EPMB for information concerning Aerosol Can Depleters.
- l. **Non-Depleted Empty Aerosol Cans** that have not been properly punctured and drained must be collected and managed as HW.
- m. **Excess HM** consists of new products that have not exceeded the expiration date for use and are unopened. Prepare a Turn in Document, DA Form 2765-1 for each NSN/product, and turn in the material and the MSDS to the respective supply support activity from which it was received (usually DOL Supply and Storage Division). MEDDAC will turn supplies back in to their Logistics Branch. Excess HM may also be turned in to the CHMCC under the free issue/turn-in procedure, if the containers are unopened, and in good condition. Obtain a receipt from the CHMCC to document proper HM management turn-in.
- n. **HM with Expired Shelf Life** These materials consist of new unopened products that have exceeded the expiration date for use. The following guidance applies to containers that are free of rust and in good condition. (Leaking, damaged, or deteriorated containers must be overpacked and turned in to DRMO as HW.)
 - Contact the DOL Classification Point Officer to ensure the product expiration dates have not been extended. Provide the DOL Classification Point Officer the product NSN, NOUN/NOMENCLATURE, Unit Identification Code (UIC), Quantity, Lot/Batch, Manufacture Date, and Test Date. If the expiration date has been extended, mark all affected containers appropriately and continue with normal turn in procedures.
 - If the expiration date is not extended, contact DPW EPMB or DRMO for guidance on turn in procedures as a HW. In some cases, it may be possible for DRMO to implement reutilization/transfer/donation/sell (R/T/D/S) procedures for the expired materials.

6-5. HAZARDOUS WASTE DOCUMENT NUMBER The generating unit's supply support will assign a HW document number to the DD Form 1348-1A. This document number will track the waste from the accumulation point through off-site disposal and be used to complete FB (DPW) Form 48 (Appendix B) for tracking. The document number must match the fund cite on the DD Form 1348-1A.

6-6. TRANSPORTATION When transporting HW on the installation the following requirements must be met:

- a. The unit must transport the HW using a government or military vehicle. Do not transport HW or any other types of waste in POVs.
- b. Drivers must have received HW management training prior to transporting HW.

- c. Vehicles transporting HW must be equipped with spill response supplies and maintain a copy of the ISCP in the vehicle.
- d. The following routes must be used when transporting HW on the installation:
 - 1) Drivers from Sand Hill proceed to the CHMCC on Custer Road, turning left onto Benning Drive, and right onto 10th Mountain Division Road. Proceed on 10th Mountain Division Road and turn left into the CHMCC.
 - 2) Drivers from Kelly Hill will proceed on Dixie Road to Lumpkin Road. Take a right on Lumpkin Road to Wold Avenue. Take a left on Wold Avenue and proceed to the T-intersection of Anderson Avenue. Take a right on Anderson and proceed to the intersection of 10th Mountain Division Road, turn left onto 10th Mountain Division Road. Proceed to the CHMCC and turn left into the facility. CHMCC personnel will accept the waste and place it in the CAP and transport to DRMO for contractor pick-up and off site treatment or disposal.

CHAPTER 7 INSTALLATION HAZARDOUS WASTE TRAINING PLAN

7-1. HAZARDOUS WASTE MANAGER'S TRAINING COURSE The EPMB provides an 8-hour course covering Hazardous Waste Management, Hazardous Waste Minimization, Safety, and Pollution Prevention. Call the EPMB at 545-4218 for class schedule and to register for the class. The ECO and the EC must maintain training records for each Unit/Activity. In addition, HWMs should keep copies of their own training records on file at or near the unit CAP or SAP.

7-2. TRAINING REQUIREMENTS

- a. Senior Environmental Compliance Officer - DPW 4-hour SECO course, one time requirement.
- b. Environmental Compliance Officer - DPW 8-hour HWM's Course, initially and annual update.
- c. Environmental Coordinator - DPW 8-hour HWM's Course, initially and annual update.
- d. HWM, CAP - DPW 8-hour HWM's Course, initially and annual update.
- e. HWM, SAP - DPW 8-hour HWM's Course, initially and annual update.

7-3. SITE-SPECIFIC TRAINING Site specific training can be coordinated through EPMB. Classes can be arranged for Safety Day, Officer Professional Development (OPD), or Non-Commissioned Officer Professional Development (NCOPD). The SECO, ECO, EC, or HWM shall provide periodic, documented, unit level training.

CHAPTER 8 RECORDKEEPING REQUIREMENTS

8-1. RECORDKEEPING The EC at each unit that generates and accumulates HW should have an Environmental Program Management Book to maintain records required by state, federal and army regulations. The Environmental management book should be appropriately tabbed and contain:

- a. Appointment Orders for the HWM, EC, and SECO
- b. Training Certificates for (HWM, EC and SECO)
- c. Hazardous Waste Inventory (FB Form 48)
- d. Hazardous Material Inventory (FB Form 47)
- e. Weekly Inspection of HW Accumulation Area (FB Form 46)
- f. Hazardous Waste Profile Sheet, MSDS and Test Data
- g. Analytical Test Data for Non-Hazardous Wastes (Dry Sweep, patches and swabs, etc.)
- h. Hazardous Waste Turn-in Forms (Form 1348-1)
- i. Unit Environmental/Hazardous Waste Management SOP
- j. Unit Activity Specific Plan for spill prevention and spill response, provided by EPMB.
- k. Fort Benning HWMP
- l. AR 200-1
- m. Installation Spill Contingency Plan (ISCP)
- n. Spill Reports

All documentation associated with HW management should be maintained for a minimum of **3 years** and be readily accessible for inspection.

CHAPTER 9 USED OIL AND POL MANAGEMENT

9-1. GENERAL Fort Benning recycles used petroleum, oils, and lubricants (POL) and is regulated as used oil. Used oil is collected and stored in underground storage tanks (UST), above ground storage tanks (AST), and drums. Fort Benning's used oil program is managed and regulated under 40 CFR 279 STANDARDS FOR THE MANAGEMENT OF USED OIL. Fort Benning currently operates a central collection point for used oil at Bldg. 2763 (Main Post Heat Plant). Used oil, accumulated in drums, should be transported, by the generating unit, to this collection facility. To facilitate transfer of used oil at the collection facility, prior coordination must be made with **DPW Utilities at 544-9327** to gain access to the area. Used oil accumulated in ASTs and USTs is managed by the DPW Contractor. The contract is overseen by DPW Construction Inspection Branch. Arrangements for pumping will be made at least 5 days prior to filling the tanks (545-1559).

9-2. ACCUMULATION OF USED OIL All used oil receptacles, tanks, and containers will be labeled as "**USED OIL**" and will be kept closed at all times to prevent spillage, unless used oil is being directly added to them. The following used oil/POL may be placed in designated USTs, ASTs or drums for recycling:

- a. all used motor oils
- b. all used transmission oils
- c. all used brake fluids
- d. all used hydraulic fluid

The following products and wastes WILL NOT be placed in used oil USTs, ASTs or drums:

- a. any hazardous waste (HW)
- b. used or new antifreeze
- c. solvents
- d. soil, dry sweep, or rags
- e. oil filters or fuel filters
- f. MOGAS
- g. JP-8 (This should be accumulated in a separate container labeled as "**JP-8**". JP-8 can be turned in to the used oil collection facility following the procedures in Section 9-1 above for used oil.)

CHAPTER 10 SECURITY, CONTINGENCY PLAN, AND SPILL PREVENTION AND RESPONSE REQUIREMENTS

10-1. Security Requirements

10-1.1 DRMO The DRMO hazardous waste storage building located on 10th Mountain Division Road is the only Georgia EPD permitted storage facility on Fort Benning. The facility has the following security measures.

- a. A fence surrounds the facility.
- b. Entrances are locked when the DRMO is not open for business.
- c. Signs with the wording "Danger Unauthorized Personnel Keep Out", are posted at the entrance.
- d. Signs with the wording "Hazardous Waste Area", are posted.
- e. Signs are legible from 25 feet.

10-1.2. CAPS 90-Day CAPs shall have the following security measures:

- a. The facility is surrounded by a fence or in a secure building.
- b. Entrances are locked when no one is working in the area.
- c. Signs with the wording "Danger Unauthorized Personnel Keep Out", are posted at the entrance.
- d. Signs with the wording "Hazardous Waste Area", are posted.
- e. Signs are legible from 25 feet.
- f. A system for providing access using some type of key control (See guidance memo in Appendix I).

10-1.3. SAPs SAPs must be located in a location that is under the control of the generator and should have a method of security to ensure waste streams are not mixed. The HWM is responsible for control of the site. A system for providing access using some type of key control (See guidance memo in Appendix I).

10-2. CONTINGENCY PLAN REQUIREMENTS (90-DAY CAP)

Units operating a **90-Day CAP** are required by federal regulation (40 CFR 264 Subpart D) to develop and maintain a Contingency Plan. The Contingency Plan must include:

- A description of the actions facility personnel must take to respond to fires explosions, or any unplanned sudden or non-sudden releases of HW or hazardous waste constituents to air, soil, or surface water at the CAP.
- A description of arrangements made with the Post Fire Department/Hazmat Response Team.
- A list of names addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and designate a primary as well as alternate coordinators.
- A list of all emergency equipment at the CAP to include fire extinguishers, spill response equipment, communication and alarm systems and decontamination equipment. The location of this equipment should also be included.
- An evacuation plan including primary and secondary evacuation routes and a description of the signal for evacuation.

Most of this information can be found in the Activity Specific Plan (Section 10-4 below) provided by EPMB. It is the unit's responsibility, however, to amend the plan to ensure all requirements listed above are met.

10-3. SPILL PREVENTION REQUIREMENTS

Army policy is to prevent oil and HW spills. To carry out this policy, HW generators will:

- Manage hazardous materials and hazardous wastes in compliance with all environmental regulations.
- Take every reasonable precaution to prevent spills.
- Maintain readiness to respond rapidly to contain and cleanup a spill.
- Report all spills to the Fire Department (Call 911).

10-4. ACTIVITY SPECIFIC PLAN

Fort Benning has developed an Integrated Contingency Plan (ICP) to meet the federal, state and Army requirements for spill prevention, response, and reporting requirements. Within the ICP are Activity Specific Plans (ASP) for unit areas that have the potential to cause a release of POL, HM or HW to the environment. The ICP also contains the Installation Spill Contingency Plan (ISCP) and is in compliance with the requirements set forth in 40 CFR 109 and 40 CFR 112 for Spill Prevention, Control and Countermeasures Plans. The ASPs are developed for specific functional areas and have been distributed to the units by EPMB. The ASP includes an inventory of the hazardous materials managed in the functional area and must be updated annually. The ASP contains the following information.

- General information about the facility including:
 - Name
 - Type of function
 - Location address
 - Charts of facility drainage patterns
 - Location maps depicting evacuation routes
- Inventory of all HM/HW management, accumulation and transfer facilities that could produce a spill. Each listing includes a prediction of direction and rate of flow and the total quantity of material that could be spilled as a result of major failure
- Spill reporting procedures
- Pre-spill planning for major potential spill areas
- Listing of emergency equipment to include fire-extinguishing systems, spill containment and cleanup equipment
- This HWMP should be included in the ASP as Attachment #1.

10-5. SPILL CONTINGENCY SUPPLIES Units/activities will maintain adequate and appropriate stocks of spill control supplies to handle their HW or material spills. Listed below are some stock numbers of commonly used items:

NSN	Description
7690-01-241-0508	HW Label
7930-00-269-1272	Absorbent material, bag
7930-01-289-8834	Absorbent socks
4235-01-456-8571	Haz Mat Pillow 10/box
7930-01-363-8631	Absorbent mats
7930-01-289-8834	Skimming Booms 8/box
4910-00-387-9592	Drain pan

NSN	Description
8110-01-302-6251	5 Gallon Steel Pail Open Head
8110-01-143-4864	5 Gallon Poly Pail Open Head
8110-00-366-6809	30 Gallon 17C Steel Drum
8110-01-372-5758	55 Gallon 17H Steel Drum
8110-01-411-8821	8 Gallon Steel Salvage Drum
8110-01-302-4252	95 Gallon overpack
8110-01-101-4055	85 Gallon Steel Salvage Drum

10-6. SPILL RESPONSE REQUIREMENTS

The basic procedure for spill response is the following.

- a. Protect yourself, isolate the area, prohibit vehicles and personnel from entering the area
 - b. If possible, shut off the source of the spill.
 - c. Prevent the spill from entering storm drains.
 - d. Contain the spill using absorbent, dirt, sand, etc.
 - e. **Immediately report any spill of hazardous material or waste to the Fort Benning Fire Department at 911.**
- The Fort Benning Fire Department is the primary responder for all releases of hazardous materials. The unit specific spill procedures will be posted in plain view at locations where there is a potential for spills. A copy of an example of a Spill Procedure Posting and the Spill Reporting Form can be found at Appendix F.

10-6.1. PETROLEUM CONTAMINATED SOIL POL products spilled on soil shall be excavated and containerized. Spill residue will have a HW characterization completed by the generating unit. Contact the EPMB for guidance.

10-6.2. ORPHAN DUMP SITES

- a. Promptly handle discoveries of abandoned or illegally dumped chemicals or wastes. The EPD considers these sites to be reportable spills. Units or activities finding such chemicals will take the following actions:
- b. Cease all activity in the immediate area and evacuate all personnel.
- c. Mark the region as a contaminated area. DO NOT remove chemicals from site, DO NOT open or move any container.
- d. Notify Range Control of the location of the site. Be prepared to provide the location and a description of material or container and approximate amount of material
- e. Range Control will notify the Fire Department, DPW Environmental Compliance Officers and/or the Environmental Branch for guidance.
- f. When the Fire Department and EPMB have determined it is safe to move the containers, it is the unit's responsibility to properly package and dispose of the waste. In accordance with the following guidelines:
 - 1) Containers of unknown/orphan waste will be treated as HW until test results prove otherwise.
 - 2) A container of unknown/orphan waste will be labeled with a yellow and red HW label. All information required on the label will be completed with the assistance of the EPMB.
 - 3) The accumulation start date is the date the container is discovered.
 - 4) Testing will be requested from DRMO immediately. Testing requirements will be specified by the EPMB.
 - 5) These containers will be stored in a area until test results are received. The date testing was requested, samples taken, and results expected should be written on the container.
 - 6) Requesting and funding of analyses and disposal are the responsibility of the unit or activity assigned to the area where the unknown/orphan waste is discovered.
 - 7) Containers will be transferred to CHMCC prior to the expiration of the 90-day limit.

CHAPTER 11

INSTALLATION WASTE MINIMIZATION PLAN

11-1. GENERAL The stated goal of the U.S. Army is to continuously reduce HW generation by seeking nonhazardous substitutions, finding and developing markets for the waste as recyclable material, and total utilization of a hazardous material to eliminate the disposal of the remainder as a hazardous waste.

11-2. HW MINIMIZATION Will be accomplished according to the HW Minimization Plan submitted to the EPA and the State of Georgia, and according to the Fort Benning Pollution Prevention Plan. Included in these plans are the following:

- a. Supply sections will not order hazardous materials in excess of actual needs, especially items that have a shelf life. Items will not be purchased in bulk quantity where smaller issue quantities are available (e.g. 5-gallon containers compared to 55-gallon drums). Items will be properly stored and protected from the elements.
- b. Supply sections will order the least hazardous material available for the completion of a task.
- c. Lithium batteries with the Complete Discharge Device (CDD) can be disposed of at the Material Recovery Facility after complete discharge of the battery. For instructions on disposal of non-hazardous lithium batteries, contact the DPW EPMB.
- d. Prior to disposal of hazardous waste, check with the DPW EPMB for guidance. Some items can be reused or disposed of as non-regulated waste.
- e. Solvent waste will be reduced by purchasing hot water parts washers to replace solvent parts washers.
- f. Aerosol can HW will be reduced by purchasing aerosol can depleters.

CHAPTER 12

MILITARY MUNITIONS RULE

12.1. General The Military Munitions Rule outlines responsibilities for the management of Waste Military Munitions. Proper management of waste munitions may prevent waste munitions from becoming Hazardous Waste. The Ammunitions Supply Point (ASP) is responsible for the management of waste munitions.

12.2. REFERENCES

- a. Department of Defense Policy to Implement the EPA's Military Munitions Rule, 20 November 1997.
- b. Military Munitions Rule, 62 FR 6621, 12 Feb 97.

12.3. RESPONSIBILITIES

- a. Ammunition Supply Point:
 - (1) The ASP is responsible for coordinating with higher headquarters and identifying those munitions that must be handled, stored, and disposed of as Waste Military Munitions (WMM) under the Military Munitions Rule.
 - (2) The ASP shall ensure that all waste munitions are collected from units, packaged, labeled, transported, and disposed of in accordance with RCRA requirements, especially those of the Military Munitions Rule.
 - (3) The ASP shall maintain storage areas for waste military munitions and these storage areas shall meet all Department of Defense Explosive Safety Board requirements at all times.
- b. Units and activities:
 - (1) Units and activities are responsible for ensuring that all munitions are handled and used in accordance with DOD policies and regulations.
 - (2) Where required by the MMR, units and activities shall recover munitions that qualify as WMM and turn them in to the ASP.
- c. Explosive Ordnance Detachment:
 - (1) The EOD shall make determinations if emergency treatment of munitions is required. In such emergencies, the EOD shall recover, destroy, or otherwise manage waste munitions as necessary to protect human health, safety, and the environment.
 - (2) EOD shall maintain records on all munitions collected and destroyed in accordance with MMR requirements.
 - (3) EOD shall also provide the installation with routine range clearance services.

d. EPMB:

- (1) The DPW EPMB will obtain any emergency permits necessary when time permits for emergency treatment of explosive ordnance.
- (2) The DPW EPMB will maintain all necessary permits with state agencies.
- (3) The DPW EPMB will provide for coordination with EPA and the Georgia Environmental Protection Division for all aspects of the Military Munitions Rule.
- (4) The DPW EPMB will provide routine training to units and activities on the Military Munitions Rule including the 2-Hour Military Munitions Rule class.

APPENDIX A RELATED PUBLICATIONS

29 CFR	Occupational Safety and Health Administration; Department of Labor
40 CFR	Protection of the Environment
49 CFR	Department of Transportation
NFPA	Fire Protection Guide of Hazardous Materials
DEQPPM 80-5	DOD Hazardous Materials Disposal Policy
DEQPPM 80-8	RCRA HW Management Regulations
AR200-1	Environmental Protection and Enhancement
Georgia HW Management Rules and Solid Waste Management Law	

APPENDIX B FORMS

1. Hazardous Waste Profile Sheet (DD Form 1930)
2. SAP Inspection Checklist (FB Form 46)
3. CAP Inspection Checklist (FB Form 49)
4. Hazardous Material Inventory (FB Form 47)
5. Hazardous Waste Inventory (FB Form 48)
6. Example DD Form 1348-1A for HW and Non-HW Turn-in and HW Testing
7. Environmental POC Poster
8. Satellite Accumulation Point Sign

Fort Benning Hazardous Waste Management Plan HAZARDOUS WASTE PROFILE SHEET 2000

PART I

A. GENERAL INFORMATION

1. GENERATOR'S NAME

WASTE PROFILE NO.

2. FACILITY ADDRESS

3. GENERATOR USEPA ID

5. ZIP CODE

4. GENERATOR STATE ID

6. TECHNICAL CONTACT

7. TITLE

PHONE

B. 1. NAME OF WASTE

2. USEPA/ or /STATE WASTE CODE(S)

3. PROCESS GENERATING WASTE

4. PROJECTED ANNUAL VOLUME/UNITS

5. MODE OF COLLECTION

6. IS THIS WASTE A DIOXIN LISTED WASTE AS DEFINED IN 40 CFR 261.31?
(e.g., F020, F021, F022, F023, F026, F027, OR F028)

☐ YES

☐ NO

7. IS THIS WASTE RESTRICTED FROM LAND DISPOSAL? (40 CFR 268)

☐ YES

☐ NO

HAS AN EXEMPTION BEEN GRANTED?

☐ YES

☐ NO

DOES THE WASTE MEET APPLICABLE TREATMENT STANDARDS?
REFERENCE STANDARDS

☐ YES

☐ NO

PART II

1. MATERIAL CHARACTERIZATION (Optional - Not Required Data)

COLOR

DENSITY

BTU/LB

TOTAL SOLIDS

ASH CONTENT

LAYERING ☐ MULTILAYERED ☐ BILAYERED ☐ SINGLE PHASE

2. RCRA CHARACTERISTICS

PHYSICAL STATE

☐ SOLID ☐ LIQUID ☐ SEMI-SOLID

☐ GAS

☐ OTHER

☐ IGNITABLE (D001) TREATMENT GROUP: ☐ WASTEWATER

FLASH POINT

☐ NON-WASTEWATER

☐ HIGH TOC (> 10%)

☐ REACTIVE (D003)

☐ LOW TOC (< 10%)

☐ WATER REACTIVE

☐ CORROSIVE (D002)

☐ CYANIDE REACTIVE

ph

☐ SULFIDE REACTIVE

☐ CORRODES STEEL

☐ TOXICITY CHARACTERISTIC
(SEE REVERSE FOR LISTING)

3. CHEMICAL COMPOSITION

COPPER NICKEL

ZINC CHROMIUM - HEX PHENOLICS

TOTAL HALOGENS VOLATILE ORGANICS

PCBs (OTHER)

NOTE: EXPLOSIVES, SHOCK SENSITIVE, PYROPHORIC, RADIOACTIVE, AND
ETIOLOGICAL WASTE ARE NOT NORMALLY ACCEPTED BY THE DRMO

6. GENERATOR CERTIFICATION

☐ CHEMICAL ANALYSIS (ATTACH TEST RESULTS)

☐ USER KNOWLEDGE (ATTACH SUPPORTING DOCUMENTS)

Explain how and why these documents comply with RCRA requirements

4. MATERIAL COMPOSITION

COMPONENT

CONCENTRATION

RANGE

TOTAL 100%

5. SHIPPING INFORMATION

DOT HAZARDOUS MATERIAL? ☐ YES ☐ NO

PROPER SHIPPING NAME

HAZARD CLASS U.N or N.A. NO.

ADDITIONAL DESCRIPTION

METHOD OF SHIPMENT ☐ BULK ☐ DRUM ☐ OTHER

CERCLA REPORTABLE QTY ((RQ)

EMERGENCY RESPONSE GUIDE PAGE

DOT PUBLICATION 5800.4 PG NO. EDIT. (YR)

SPECIAL HANDLING INFORMATION

I, HEREBY
CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS AND
ALL ATTACHED DOCUMENTS IS TO THE BEST OF MY
KNOWLEDGE AN ACCURATE REPRESENTATION OF THE
WASTE TURNED IN TO THE DRMO. ALL KNOWN OR
SUSPECTED HAZARDS HAVE BEEN DISCLOSED.

Signature of Generator's Representative

Date

TOXICITY CHARACTERISTIC LIST

CONTAMINANT	CAS NO.	EPA HW NO.	(mg/L)	CONTAMINANT	CAS NO.	EPA HW NO.	(mg/L)
<input type="checkbox"/> ARSENIC 7440-38-2		D004		<input type="checkbox"/> HEXACHLORO-BUTADIENE 87-68-3		D033	
<input type="checkbox"/> BARIUM 7440-39-3		D005		<input type="checkbox"/> HEXACHLOROETHANE 67-72-1		D034	
<input type="checkbox"/> BENZENE 71-43-2		D018		<input type="checkbox"/> LEAD 7439-92-1		D008	
<input type="checkbox"/> CADMIUM 7440-43-9		D006		<input type="checkbox"/> LINDANE 58-89-9		D013	
<input type="checkbox"/> CARBON TETRACHLORIDE 56-23-5		D019		<input type="checkbox"/> MERCURY 7439-97-6		D009	
<input type="checkbox"/> CHLORDANE 57-74-9		D020		<input type="checkbox"/> METHOXYCHLOR 72-43-5		D014	
<input type="checkbox"/> CHLOROBENZENE 108-90-7		D021		<input type="checkbox"/> METHYL EHTYL KETONE 78-43-3		D035	
<input type="checkbox"/> CHLOROFORM 67-66-3		D022		<input type="checkbox"/> NITROBENZENE 98-95-3		D036	
<input type="checkbox"/> CHROMIUM 7440-47-3		D007		<input type="checkbox"/> PENTACHLOROPHENOL 87-86-5		D037	
<input type="checkbox"/> O-CRESOL 95-48-7		D023		<input type="checkbox"/> PYRIDINE 110-86-1		D038	
<input type="checkbox"/> M-CRESOL 108-39-4		D024		<input type="checkbox"/> SELENIUM 7782-49-2		D010	
<input type="checkbox"/> P-CRESOL 106-44-5		D025		<input type="checkbox"/> SILVER 7740-22-4		D011	
<input type="checkbox"/> CRESOL --- --- ---		D026		<input type="checkbox"/> TETRACHLOROETHYLENE 127-18-4		D039	
<input type="checkbox"/> 2,4-D 94-75-7		D016		<input type="checkbox"/> TOXAPHENE 8001-35-2		D015	
<input type="checkbox"/> 1,4-DICHLOROBENZENE 106-46-7		D027		<input type="checkbox"/> TRICHLOROETHYLENE 79-01-6		D040	
<input type="checkbox"/> 1,2-DICHLOROETHANE 107-06-2		D028		<input type="checkbox"/> 2,4,5-TRICHLOROPHENOL 95-95-4		D041	
<input type="checkbox"/> 1,1-DICHLOROETHYLENE 75-35-4		D029		<input type="checkbox"/> 2,4,6-TRICHLOROPHENOL 88-06-2		D042	
<input type="checkbox"/> 2,4-DINITROTOLUENE 121-14-2		D030		<input type="checkbox"/> 2,4,5-TP (SILVEX) 93-72-1		D017	
<input type="checkbox"/> ENDRIN 72-20-8		D012		<input type="checkbox"/> VINYL CHLORIDE 75-01-4		D043	
<input type="checkbox"/> HEPTACHLOR (AND ITS HYDROXIDE) 76-44-8		D031					
<input type="checkbox"/> HEXACHLOROBENZENE 118-74-1		D032					

PART III

FOR DRMO USE ONLY DRMO VERIFICATION

1. DATE VERIFIED _____

2. RESULTS ☐ ATTACHED

ph _____ FLASH POINT _____ SPECIFIC GRAVITY _____ HALIDES (TOX) _____

REACTIVITY: WATER REACTIVITY _____ CYANIDES _____ SULFIDES _____

TCLP

Hazardous Waste Satellite Accumulation Point (SAP) Inspection Form (FB Form 46)

Weekly inspections must be completed by the Hazardous Waste (HW) Manager and monthly by the Environmental Coordinator (EC). Copies of inspection results must be maintained by both individuals.

Unit/Activity	Bldg#	Month/Year						
Key: C= Compliance NC= Noncompliance NA= Not Applicable								
A. SATELLITE ACCUMULATION POINT (SAP)			WEEKLY					Monthly
			1ST	2ND	3RD	4TH	5TH	
1. Containers in good condition and compatible with wastes stored in them.								
2. Containers are sealed/closed when not in use.								
3. Containers are labeled properly with a complete HW label.								
4. Labels on full containers of HW are marked with the accumulation start date (the date the container was filled or closed for the last time).								
5. Full containers are turned-in to the CHMCC or a 90 day CAP within 3 days of filling or closing for the last time.								
6. Containers are on pallets and have adequate secondary containment (if liquid)								
7. Proper DOT Shipping name is marked on the HW label.								
8. Containers with highly flammable contents are grounded								
9. Containers are not exposed to the weather.								
10. All spills are cleaned up immediately.								
11. SAP area is secure to prevent unauthorized access.								
12. Hazardous Waste Inventory is properly maintained (Fort Benning Hazardous Waste Inventory Form 48)								
13. Materials for spill containment and response are readily available.								
14. SAP is identified with proper signage.								
15. Hazardous waste is segregated and clearly distinguished from nonregulated waste and hazardous materials.								
16. SAPs and HM storage areas are not located near sanitary sewage or storm water drains.								
17. Fire extinguisher is within 50 feet of the SAP.								
18. Fort Benning Environmental Point of Contact Poster is correctly completed and displayed.								
B. ADMINISTRATION								
1. Inspections are conducted weekly, recorded on Fort Benning SAP Inspection Form 46, and maintained on file for 3 years.								
2. DD Form 1348-1 is maintained on file for 3 years.								
3. Current copy of Fort Benning Hazardous Waste Management Plan is available.								
4. Unit specific spill response plan is available.								
5. Unit maintains an Environmental Management SOP.								
6. Unit specific evacuation map is available.								
7. Hazardous Material Inventory is current and Material Safety Data Sheets (MSDS) are maintained.								
8. All waste streams have been properly characterized with HW Profile Sheets (DRMS Form 1930), test results and MSDS on file.								
C. PERSONNEL TRAINING								
1. The Unit/activity has a HW Manager appointed and training certificate is current and on file for a minimum of 3 years.								
2. Copies of appointment orders for SECOs, ECs, ECOs and HWMs are available and on file.								

[illegible]

**INSTRUCTIONS FOR COMPLETION OF
HAZARDOUS WASTE SATELLITE ACCUMULATION POINT (SAP) INSPECTION CHECKLIST (FB FORM
46)**

This inspection checklist is to be used for Satellite Accumulation Points (SAPs). The appointed HW Manager for the SAP will conduct weekly inspections. Monthly inspections will be conducted by the EC. The HW Manager and the EC will maintain copies of the completed inspection forms on file for a minimum of 3 years. Applicable regulations for the management of SAPs are contained in the Fort Benning Hazardous Waste Permit and 40 Code of Federal Regulation Parts 262 and 264. The state of Georgia has directly adopted these federal regulations.

The inspector should annotate "C" when area is in compliance and "NC" when the area fails to meet compliance standards. Provide comments or corrective actions where "NC" has been indicated.

A. SATELLITE ACCUMULATION POINT (SAP)

1. Containers are in good condition and compatible with wastes stored in them.

Containers must be free of dents, rust, and corrosion. Bungs and tops must seal properly and tightly. Boxes used for accumulation must be in good condition. All old labels should be removed or painted over. Containers must not be exposed to weather. Containers must be compatible with the waste stored in them.

2. Containers are sealed/closed when not in use.

Drum lids, rings and bungs MUST remain securely closed unless the generator is actively adding waste to the container. Funnels without proper seals may not be left in open tops of drums. Boxes used for HW accumulation must be securely closed with the top taped closed.

3. Containers are labeled properly with a complete HW Label.

Containers must have the yellow and red Hazardous Waste label affixed prior to adding any waste. The label must be completed with all information including the EPA waste code and EPA I.D number. However, the accumulation start date must not be marked on the label until the container is closed for the last time, or a quantity of 55 gallons is reached. See Appendix C of the HWMP for labeling guidance.

4. Labels on full containers of HW are marked with the accumulation start date (the date the container was filled or closed for the last time).

The accumulation start date for a SAP is the day the container is filled or closed for the last time. A maximum of 55 gallons of HW may be accumulated for no more than 3 consecutive days in a SAP. Accumulation of greater than 55 gallons of HW in a SAP is a violation, as is storage of 55 gallons for longer than 3 days. Avoid the potential to exceed 55 gallons in a SAP by maintaining a capacity for waste accumulation of 55 gallons.

5. Full containers are turned-in to the CHMCC or a 90-day CAP within 3 days of filling or closing for the last time.

Turn-in will require the completion of a 1348-1 to include a fund cite and a waste profile number. (see Chapter Six of this plan for turn-in guidance).

6. Containers are on pallets, and have adequate secondary containment (if waste is liquid).

Containers in SAPs should be placed on pallets in a location where a spill or release from the container will not impact soil, storm drains or sanitary sewer drains. Liquid wastes should be accumulated in an area that provides secondary containment. Secondary containment should hold 10% of the volume of all of the containers, or 110% of the largest container, whichever is larger. Ideal secondary containment is achieved with drum coffins or spill pallets that are commercially available. Secondary containment must be maintained free of rainwater and spills. Residues in secondary containment should be immediately removed and properly characterized and managed.

7. Proper DOT shipping name is marked on the HW label.

The Proper DOT shipping name includes the DOT Name, hazard class, UN/NA number and Packing Group. This information is available from Hazardous Waste Profile Sheet. See Appendix C of this plan for guidance.

8. Containers with highly flammable contents are grounded.

To reduce fire hazards from friction, all containers with highly flammable contents must be properly grounded.

9. Containers are not exposed to the weather.

Exposing containers to the weather causes unnecessary corrosion of the container and decreases the life span of the container. In addition, accumulation of rainwater in the secondary containment area will result in unnecessary testing and possible violations. All containers must be stored out of the weather.

10. All spills are cleaned up immediately.

Federal and state laws require generators to clean up any releases of HW and hazardous materials immediately. Inspect work areas for spilled POLs, HM or HW on hardstand, in the containment area, and in surrounding soils. There should be no standing liquid spills nor oil stains on the soil or concrete. Spill residues must be contained, characterized and disposed of properly in coordination with EPMB guidelines.

11. SAP area is secure to prevent unauthorized access.

The SAP area should be secure in the workplace and under the control of the generator, yet accessible whenever operations that generate hazardous waste are being conducted.

12. Hazardous Waste Inventory is properly maintained (Fort Benning Hazardous Waste Inventory Form 48).

The FB(DPW) Form 48 should be completed as containers are removed from the SAPs to a CAP or CHMCC. A completed DD Form 1348-1 must be available for each waste turn-in to ensure complete "cradle-to-grave" tracking. The FB(DPW) Form 48 should be maintained on file by the HW Manager and the EC for 3 years.

13. Materials for spill containment and response are readily available.

Spill response materials are required to be located at the SAP. The materials must be adequate for the types and quantities of HW accumulated at the SAP. They must be adequate to handle "worst case" scenarios for spills.

14. SAP is identified with proper signage.

Each SAP must have a sign stating "Hazardous Waste Satellite Accumulation Area" and the Environmental POC poster. See Appendix D for an example.

15. Hazardous Waste is segregated and clearly distinguished from non-regulated waste and hazardous materials.

Non-HW and hazardous materials must be clearly segregated from the SAP. The SAP is to be utilized for HW only. The SAP should be set up so that containers can easily be inspected from all sides and clear aisle space is provided. The SAP container should have at least 2 feet of space separating it on all sides from other non-hazardous wastes and hazardous materials.

16. SAPs and HM storage areas are not located near sanitary sewage or storm water drains.

Neither HW nor HM may be stored near storm water or sanitary sewage drains. SAPs and HM Storage areas may not be located near oil/water separators or washracks.

17. Fire extinguisher is within 50 feet of the SAP.

A fire extinguisher must be located within 50 feet of the SAP and easily accessible in case of a fire.

18. Fort Benning Environmental Point of Contact Poster is correctly completed and displayed.

The POC Poster (Appendix D) may be copied and utilized.

ADMINISTRATION

1. Inspections are conducted weekly, recorded on Fort Benning SAP Inspection Form 46, and maintained on file for three years.

This form must be completed weekly by the HW Manager and monthly by the EC. All forms should be properly signed and dated with copies maintained by the HW Manager. Ensure all comments and corrective actions are addressed and documented. Corrective action issues and requirements must be communicated to the chain of command.

2. DD Form 1348-1 is maintained for three years.

All turn in documents for HW/HM and nonregulated waste must be maintained on file for 3 years. This includes all accompanying documentation, e.g. test results, MSDS, and Hazardous Waste Profile Sheets.

3. Current copy of Fort Benning Hazardous Waste Management Plan is available.

Copies of the plan can be obtained from the DPW EPMB. The plan provides direct guidance for the proper management of waste at Fort Benning.

4. Unit specific spill response plan is available.

Each unit must have a written Spill Plan that addresses specific HM/HW and nonregulated wastes stored at the SAP and general work area. The Activity Specific Plan fulfills this requirement. Spill response procedures should also be posted in the SAP area.

5. Unit maintains an Environmental Management SOP.

The unit SOP should incorporate by reference the Fort Benning Hazardous Waste Management Plan. It should include a listing of appointed personnel (HWM, EC, ECO and SECO), and HW Accumulation Point locations. The SOP should be available for review.

6. Unit specific evacuation map is available.

Unit should have maps posted in the area detailing the closest evacuation route in the event of a fire or spill at the SAP and HM storage areas.

7. Hazardous Material Inventory is current and Material Safety Data Sheets (MSDSs) are maintained.

Material Safety Data Sheets for all HM used and/or stored by the unit must be readily accessible to all workers handling the materials. The Hazardous Material Inventory should be completed on the FB(DPW) Form 47 (or equivalent). This form should contain average quantities of HM stocked.

8. All waste streams have been properly characterized with HW Profile Sheets (DRMS Form 1930), test results and supporting MSDS on file (as applicable).

A waste determination must be completed for any solid waste generated. The supporting documentation must be kept on file for 3 years. This includes any test results and MSDSs used to support the determination.

B. PERSONNEL TRAINING

1. The Unit/activity has a HW Manager appointed, and training certificate is current and on file for a minimum of three years.

DPW Environmental provides the HW Managers course for HWMs and ECs. Copies of certificates must be on-site to inspectors. All appointed personnel must receive initial HW training and refresher training annually. Records must be maintained on file for a minimum of 3 years.

2. Copies of appointment orders for SECOs, ECs, ECOs, and HWMs, are available and on file.

Appointment orders and job description should be on file and available for inspection. See the HWMP Appendix H Structure for Environmental Management Policy for further personnel appointment guidance

3. Documentation of unit/activity specific training sessions for personnel handling waste is current and on file

Maintain a file of training rosters for all HW handlers. The EC or HW Manager should be providing worker-level, unit-specific training on a quarterly basis.

4. All workers have read the Unit Environmental SOP and have access to it on a daily basis.

C. MOTOR POOL BAYS/VEHICLE STORAGE AREAS

1. All spills are cleaned up immediately.

There should be no evidence of spills, such as staining on concrete, soil or gravel.

2. Materials for spill response are readily available.

A separate spill kit needs to be available in the motor pool bay for spills that occur during routine maintenance. This should include the dry sweep kept for small spills, but must include contingency material and overpack for larger (20-100 gallon) spills.

3. Drip pans are placed under tactical and off road vehicles and are properly maintained and emptied as needed.

Drip pans must be placed under vehicles to ensure drips and leaks do not cause a release or spill. Drip pans under the vehicles should be emptied daily. Drip pans catching oil/water mixtures may be dumped into functioning oil/water separators.

4. Used oil filters are crushed and properly segregated and disposed of.

Oil filters must be hot drained and crushed. The drained oil will be managed as used oil. Crushed filters can be turned in as scrap metal or disposed of as solid waste.

5. Used oil is properly deposited into secure collection systems.

Used oil should only be accumulated in approved collection areas that are appropriately labeled as Used Oil.

6. Used oil receptacles and containers are properly labeled "USED OIL"

Do not use the phrase "WASTE OIL."

7. Used oil tanks and collection sumps are monitored and emptied to prevent overflow.

Used oil tanks and sumps must be monitored to ensure that proper arrangements can be made with DPW Construction Inspection Branch for used oil pickup and to ensure that the tank is not leaking. Daily records should be kept on the UST monitoring by unit personnel.

8. Oil/water separators are functioning properly.

Oil/water separators should be monitored to determine when the used oil tank and grit chamber require servicing. Turn in work orders (Form 4283) for maintenance. DPW Engineering Division can assist in determining if oil/water separators are functioning correctly and can assist in repairs if necessary.

9. No materials are stored in excess of normal consumption.

Utilize good inventory control practices to avoid the generation of excess HM and expired shelf-life waste.

10. Waste streams are not mixed.

Mixing waste streams makes disposal difficult and COSTLY. Ensure that POLs, solvents, paints and other wastes.

11. Parts washers/weapons cleaners are labeled with contents and are kept closed when not in use.

Parts washers need to be labeled with the contents. Lids should be closed when not in use to prevent evaporation of solvent and violation of the Clean Air Act.

Hazardous Waste 90-DAY CENTRAL ACCUMULATION POINT (CAP) Inspection (Form 49)

Weekly inspections to be completed by the Hazardous Waste (HW) Manager and monthly by the Environmental Coordinator (EC). Copies of inspection results must be maintained by both individuals.

Unit/Activity	Bldg#	Month/Year					
Key: C= Compliance NC= Noncompliance NA= Not Applicable							
A. CENTRAL ACCUMULATION POINT (CAP)		WEEKLY					Monthly
		1ST	2ND	3RD	4TH	5TH	
1. Containers in good condition and compatible with wastes.							
2. Containers are sealed/closed when not in use.							
3. Containers are labeled properly.							
4. Container labels are marked with the accumulation start dates.							
5. Containers are turned in to the CHMCC within 90 days of the accumulation start date (60 days preferable).							
6. Containers are stored on pallets and have adequate secondary containment							
7. DOT Shipping name and hazard class are marked on the container HW label.							
8. Containers with highly flammable contents are grounded							
9. Containers are not exposed to the weather.							
10. All spills are cleaned up immediately.							
11. CAP area is secure to prevent unauthorized access.							
12. Hazardous Waste Inventory is properly maintained (Fort Benning Hazardous Waste Inventory Form 48)							
13. An overpack and materials for spill response are readily available.							
14. CAP is properly signed to restrict access and warn of potential hazards							
15. Hazardous waste is segregated and clearly distinguished from non-regulated waste and hazardous materials.							
16. CAP is not located near any drainage.							
17. Fire extinguisher is within 50 feet of the area.							
B. ADMINISTRATION							
1. Inspections are conducted weekly, recorded on Fort Benning Form 49, and maintained on file for 3 years.							
2. DD Form 1348-1 and inspections are on file for 3 years.							
3. Current copy of Fort Benning Hazardous Waste Management Plan is available.							
4. CAP specific Contingency Plan and Unit Spill Prevention, Control and Countermeasure Plan is available.							
5. Unit Environmental Management SOP has been approved by the DPW Environmental Programs Management Branch and is available.							
6. Unit specific evacuation map is available.							
7. MSDS's and Hazardous Material Inventory are current and available.							
8. Fort Benning Environmental Coordinator Poster is correctly completed and displayed.							
9. All waste streams have been properly established and test results are on file.							
C. PERSONNEL TRAINING							
1. The HW Manager has attended the Hazardous Waste Manager's Course and training records are available.							
2. HW Manager has appointment orders and job description available and on file.							

[illegible]

**INSTRUCTIONS FOR COMPLETION OF
HAZARDOUS WASTE 90-DAY CENTRAL ACCUMULATION POINT (CAP) INSPECTION (FORM 49)**

This inspection checklist is to be used for 90-Day CAPs. The appointed HW Manager for the CAP will conduct weekly inspections. Monthly inspections will be conducted by the EC. The HW Manager and the EC will maintain copies of the completed inspection forms on file for a minimum of 3 years. Applicable regulations for the management of CAPs are contained in the Fort Benning Hazardous Waste Permit and 40 Code of Federal Regulation Parts 262 and 264. The state of Georgia has directly adopted these federal regulations.

The inspector should annotate "C" when area is in compliance and "NC" when the area fails to meet compliance standards. Provide comments or corrective actions where "NC" has been indicated.

B. CENTRAL ACCUMULATION POINT (CAP)

1. Containers in good condition and compatible with wastes

Containers must be free of dents, rust, and corrosion. Bungs and tops must seal properly and tightly. Boxes used for accumulation must be in good condition. All old labels should be removed or painted over. Containers must not be exposed to weather. Containers must be compatible with the waste stored in them.

2. Containers are sealed/closed when not in use.

Drum lids, rings and bungs MUST remain securely closed unless the generator is actively adding waste to the container. Funnels without proper seals may not be left in open tops of drums. Boxes used for HW accumulation must be securely closed with the top taped closed.

3. Containers are labeled properly with a complete HW Label.

Containers must have the yellow and red Hazardous Waste label affixed prior to adding any waste. The label must be completed with all information including the EPA waste code and EPA I.D number. However, the accumulation start date must not be marked on the label until the container is closed for the last time, or a quantity of 55 gallons is reached. See Appendix C of the HWMP for labeling guidance.

4. Labels on full containers of HW are marked with the accumulation start date

The accumulation start date for a CAP is the day the container is FIRST placed in the CAP or the date waste is first placed in a container in the CAP.

5. Containers are turned-in to the CHMCC within 90-days of the Accumulation Start Date.

Turn-in will require the completion of a 1348-1 to include a fund cite and a waste profile number. (see Chapter Six of this plan for turn-in guidance). Containers should be turned in within 60 days to provide time for processing.

6. Containers are on pallets, and have adequate secondary containment (if waste is liquid).

Containers in a CAP should be placed on pallets in a location where a spill or release from the container will not impact soil, storm drains or sanitary sewer drains. Liquid wastes should be accumulated in an area that provides secondary containment. Secondary containment should hold 10% of the volume of all of the containers, or 110% of the largest container, whichever is larger. Ideal secondary containment is achieved with drum coffins or spill pallets that are commercially available. Secondary containment must be maintained free of rainwater and spills. Residues in secondary containment should be immediately removed and properly characterized and managed.

7. Proper DOT shipping name is marked on the HW label.

The Proper DOT shipping name includes the DOT Name, hazard class, UN/NA number and Packing Group. This information is available from Hazardous Waste Profile Sheet. See Appendix C of this plan for guidance.

8. Containers with highly flammable contents are grounded.

To reduce fire hazards from friction, all containers with highly flammable contents must be properly grounded.

9. Containers are not exposed to the weather.

Exposing containers to the weather causes unnecessary corrosion of the container and decreases the life span of the container. In addition, accumulation of rainwater in the secondary containment area will result in unnecessary testing and possible violations. All containers must be stored out of the weather.

10. All spills are cleaned up immediately.

Federal and state laws require generators to clean up any releases of HW and hazardous materials immediately. Inspect work areas for spilled POLs, HM or HW on hardstand, in the containment area, and in surrounding soils. There should be no standing liquid spills nor oil stains on the soil or concrete. Spill residues must be contained, characterized and disposed of properly in coordination with EPMB guidelines.

11. CAP area is secure to prevent unauthorized access.

The CAP area should be a secure area in the workplace and under the control of the generator, yet accessible whenever operations that generate hazardous waste are being conducted.

12. Hazardous Waste Inventory is properly maintained (Fort Benning Hazardous Waste Inventory Form 48).

The FB(DPW) Form 48 should be completed as containers are moved into the CAP and when they are removed from the CAP to the CHMCC. A completed DD Form 1348-1 must be available for each waste turn-in to ensure complete "cradle-to-grave" tracking. The FB(DPW) Form 48 should be maintained on file by the HW Manager and the EC for 3 years.

13. Materials for spill containment and response are readily available.

Spill response materials are required to be located at the CAP. The materials must be adequate for the types and quantities of HW accumulated at the CAP. They must be adequate to handle "worst case" scenarios for spills.

14. CAP is identified with proper signage.

Each CAP must have a sign stating "Hazardous Waste Satellite Central Accumulation Point" and the Environmental POC poster.

15. Hazardous Waste is segregated and clearly distinguished from non-regulated waste and hazardous materials.

Non-HW and hazardous materials must be clearly segregated from the CAP. The CAP is to be utilized for HW only. The CAP should be set up so that containers can easily be inspected from all sides and clear aisle space is provided. The CAP container should have at least 2 feet of space separating it on all sides from other wastes.

16. CAP and HM storage areas are not located near sanitary sewage or storm water drains.

Neither HW nor HM may be stored near storm water or sanitary sewage drains. CAPs and HM Storage areas may not be located near oil/water separators or washracks.

17. Fire extinguisher is within the CAP.

A fire extinguisher must be located within the CAP and easily accessible in case of a fire.

D. ADMINISTRATION

1. Inspections are conducted weekly, recorded on Fort Benning CAP Inspection Form 49, and maintained on file for three years.

This form must be completed weekly by the HW Manager and monthly by the EC. All forms should be properly signed and dated with copies maintained by the HW Manager. Ensure all comments and corrective actions are addressed and documented. Corrective action issues and requirements must be communicated to the chain of command.

2. DD Form 1348-1 is maintained for three years.

All turn in documents for HW/HM and nonregulated waste must be maintained on file for 3 years. This includes all accompanying documentation, e.g. test results, MSDS, and Hazardous Waste Profile Sheets.

3. Current copy of Fort Benning Hazardous Waste Management Plan is available.

Copies of the plan can be obtained from the DPW EPMB. The plan provides direct guidance for the proper management of waste at Fort Benning.

4. CAP specific Contingency Plan and Unit Spill plan is available.

Each unit must have a written Contingency and Spill Plan that addresses specific HW wastes accumulated at the CAP and general work area. The Activity Specific Plan fulfills this requirement. Spill response procedures should also be posted in the CAP.

5. Unit maintains an Environmental Management SOP.

The unit SOP should incorporate by reference the Fort Benning Hazardous Waste Management Plan. It should include a listing of appointed personnel (HWM, EC, ECO and SECO), and HW Accumulation Point locations. The SOP should be available for review.

6. Unit specific evacuation map is available.

Unit should have maps posted in the area detailing the closest evacuation route in the event of a fire or spill at the SAP and HM storage areas.

7. Hazardous Material Inventory is current and Material Safety Data Sheets (MSDSs) are maintained.

Material Safety Data Sheets for all HM used and/or stored by the unit must be readily accessible to all workers handling the materials. The Hazardous Material Inventory should be completed on the FB(DPW) Form 47 (or equivalent). This form should contain average quantities of HM stocked.

8. All waste streams have been properly characterized with HW Profile Sheets (DRMS Form 1930), test results and supporting MSDS on file (as applicable).

A waste determination must be completed for any solid waste generated. The supporting documentation must be kept on file for 3 years. This includes any test results and MSDSs used to support the determination.

E. PERSONNEL TRAINING

1. The Unit/activity has a HW Manager appointed, and training certificate is current and on file for a minimum of three years.

DPW Environmental provides the HW Managers course for HWMs and ECs. Copies of certificates must be on-site to inspectors. All appointed personnel must receive initial HW training and refresher training annually. Records must be maintained on file for a minimum of 3 years.

2. Copies of appointment orders for SECOs, ECs, ECOs, and HWMs, are available and on file.

Appointment orders and job description should be on file and available for inspection. See the HWMP Appendix H Structure for Environmental Management Policy for further personnel appointment guidance

3. Documentation of unit/activity specific training sessions for personnel handling waste is current and on file

Maintain a file of training rosters for all HW handlers. The EC or HW Manager should be providing worker-level, unit-specific training on a quarterly basis.

4. All workers have read the Unit Environmental SOP and have access to it on a daily basis.

F. MOTOR POOL BAYS/VEHICLE STORAGE AREAS

1. All spills are cleaned up immediately.

There should be no evidence of spills, such as staining on concrete, soil or gravel.

2. Drip pans are placed under tactical and off road vehicles and are properly maintained and emptied as needed.

Drip pans must be placed under vehicles to ensure drips and leaks do not cause a release or spill. Drip pans under the vehicles should be emptied daily. Drip pans catching oil/water mixtures may be dumped into functioning oil/water separators.

3. Materials for spill response are readily available.

A separate spill kit needs to be available in the motor pool bay for spills that occur during routine maintenance. This should include the dry sweep kept for small spills, but must include contingency material and overpack for larger (20-100 gallon) spills.

4. Used oil filters are crushed and properly segregated and disposed of.

Oil filters must be hot drained and crushed. The drained oil will be managed as used oil. Crushed filters can be turned in as scrap metal or disposed of as solid waste.

5. Used oil is properly deposited into secure collection systems.

Used oil should only be accumulated in approved collection areas that are appropriately labeled as Used Oil.

6. Used oil receptacles and containers are properly labeled "USED OIL"

Do not use the phrase "WASTE OIL."

7. Used oil tanks and collection sumps are monitored and emptied to prevent overflow.

Used oil tanks and sumps must be monitored to ensure that proper arrangements can be made with DPW Construction Inspection Branch for used oil pickup and to ensure that the tank is not leaking. Daily records should be kept on the UST monitoring by unit personnel.

8. Oil/water separators are functioning properly.

Oil/water separators should be monitored to determine when the used oil tank and grit chamber require servicing. Turn in work orders (Form 4283) for maintenance. DPW Engineering Division can assist in determining if oil/water separators are functioning correctly and can assist in repairs if necessary.

9. No materials are stored in excess of normal consumption.

Utilize good inventory control practices to avoid the generation of excess HM and expired shelf-life waste.

10. Waste streams are not mixed.

Mixing waste streams makes disposal difficult and COSTLY. Ensure that POLs, solvents, paints and other wastes.

11. Parts washers/weapons cleaners are labeled with contents and are kept closed when not in use.

Parts washers need to be labeled with the contents. Lids should be closed when not in use to prevent evaporation of solvent and violation of the Clean Air Act.

[illegible]

<p align="center">FORT BENNING</p> <p align="center">HAZARDOUS WASTE INVENTORY FORM (FB Form 48)</p> <p>Maintain this form in the CAP to provide a tracking system for the HW accumulated in the CAP. Ensure all wastes tracked are properly characterized with Material Safety Data Sheets and/or Test Results. Maintain all copies of all DD Form 1348-1's to document waste turn-in. Keep this form on file for a minimum of 3 years.</p>				DATE	
				FISCAL YEAR	
ACTIVITY/UNIT				BUILDING NUMBER	
WASTE NOMENCLATURE OR PROPER SHIPPING NAME	VOLUME (GAL)	EPA HW WASTE ID NUMBER	ACCUMULATION START DATE (Date waste container was placed in the CAP)	DATE WASTE TURNED-IN TO CHMCC	POC

EXAMPLE 1348-1-HAZARDOUS WASTE

U.S. GOVERNMENT PRINTING OFFICE: 1982-308-569

DD FORM 1348-1A, JUL 91 ISSUE RELEASE/RECEIPT DOCUMENT

27. ORIGINAL DATA

1. TOTAL PRICE
2. SHIP FROM
3. SHIP TO
4. MARK FOR
5. DOC DATE
6. MMFC
7. FRT RATE
8. TYPE CARGO
9. PS
10. QTY. RECD
11. UP
12. UNIT WEIGHT
13. UNIT CUBE
14. LFC
15. SL
16. FREIGHT CLASSIFICATION NOMENCLATURE
17. ITEM NOMENCLATURE
18. TY CONT
19. MO CONT
20. TOTAL WEIGHT
21. TOTAL CUBE
22. RECEIVED BY
23. DATE RECEIVED

DR 1 01 N A N H

W90KPJ 9335-W011

8010-00-021-2885

POC: Bill Gates
545-1111

2102020.0000 0762013 113008.0000 25GY 13B34M W90KPJ-9335W011 B34M13 00938 \$375.24

HMP # W90KPJ-9205 CLIN:9101 1.416 X 265 - \$375.24

PREVIOUS EDITION MAY BE USED

EXAMPLE 1348-1-NON-HAZARDOUS WASTE

U.S. GOVERNMENT PRINTING OFFICE: 1985-389-505

DD FORM 1348-1A, JUL 81 ISSUE RELEASE/RECEIPT DOCUMENT

IN ADDITION TO THE FOLLOWING INFORMATION, THE FOLLOWING INFORMATION IS REQUIRED:

1. TOTAL PRICE
2. SHIP FROM
3. SHIP TO
4. MARK FOR HM
5. DOC DATE
6. NMPC
7. FRT RATE
8. TYPE CARD
9. PS
10. QTY. RECD
11. UP
12. UNIT WEIGHT
13. UNIT CUBE
14. UPC
15. SL
16. FREIGHT CLASSIFICATION NOMENCLATURE
17. ITEM NOMENCLATURE
18. TY CONT
19. NO CONT
20. TOTAL WEIGHT
21. TOTAL CUBE
22. RECEIVED BY
23. DATE RECEIVED

DR 3 01 N A N H 45 00 45 00

W33BQ9 8231-0003

6135-01-036-3495

POC: Bill Gates
545-2222

2182020 0000057-1013 325796.CF00025GZ L3C4HW W33BQ982170661 C4BWIL 009038 \$286.77

CLIN: 9904 .33 X 869 = \$286.77

PREVIOUS EDITION MAY BE USED

EXAMPLE 1348-1-WASTE TESTING REQUEST

U.S. GOVERNMENT PRINTING OFFICE: 1995-309-808

DD FORM 1348-1A, JUL 91 ISSUE RELEASE/RECEIPT DOCUMENT

1. TOTAL PRICE
DOLLARS CTS
2. SHIP FROM
YOUR UNIT
3. SHIP TO
DSND
Ft. Benning
4. MARK FOR

5. DOC DATE 6. NMFC 7. FRT RATE 8. TYPE CARGO 9. PS
10. QTY. RECD 11. LP 12. UNIT WEIGHT 13. UNIT CUBE 14. UFC 15. SL
16. FREIGHT CLASSIFICATION NOMENCLATURE
Perform complete TCLP, haz. char., F-series
17. ITEM NOMENCLATURE
solvent on drum of unknown liquid
18. TY CONT 19. NO CONT 20. TOTAL WEIGHT 21. TOTAL CUBE
22. RECEIVED BY 23. DATE RECEIVED

W33BRB 7015-0001

POC: James Brown
544-9999

2172020 0000 0 57 1013 325756.15000 25GZ 000000 W33BRB 7015-0001 B2AH00 009038 \$920.40

CLIN's: 6600,6617,6623

ENVIRONMENTAL POCS

Fort Benning Hazardous Waste Management Plan
2000

ENVIRONMENTAL COMPLIANCE OFFICER:

NAME_____ PHONE #_____

ENVIRONMENTAL COORDINATOR:

NAME_____ PHONE #_____

HAZARDOUS WASTE MANAGER:

NAME_____ PHONE #_____

SAP Sign

Hazardous Waste Satellite Accumulation Point #1 Fuel Filters

Hazardous Waste Satellite Accumulation Point # 2 Waste Paint

APPENDIX C WASTE LABELING/MARKING GUIDANCE

1. HW Labeling Guidance
2. HW Label
3. Used Oil Marking
4. JP-8 Marking
5. Non-Hazardous Waste Label
6. Universal Waste Label
 - a. Fluorescent Bulbs
 - b. Batteries

HW Labeling Guidance

HAZARDOUS WASTE IDENTIFICATION
AND
LABELING GUIDANCE

All Hazardous Waste containers must be properly labeled with a yellow and red Hazardous Waste Label (see attached example). The following information must appear on each label:

1. Name – Complete with your unit/activity name
2. Address – Complete with your unit/activity address
3. Phone – Complete with your unit/activity phone number
4. City – *Fort Benning*
5. State – *GA*
6. ZIP – *31905*
7. EPA ID NO./Manifest Document No. – *GA3210020084/* _____
8. Accumulation Start Date – Leave Blank if in a SAP (If in 90-Day complete with date placed in 90 day accumulation area)
9. EPA Waste No. – See Column 2 in Waste Identification Table below
10. DOT Proper Shipping name and UN or NA No. with Prefix – See Column 3 in Waste Identification Table below

WASTE IDENTIFICATION TABLE FOR COMMONLY GENERATED WASTES

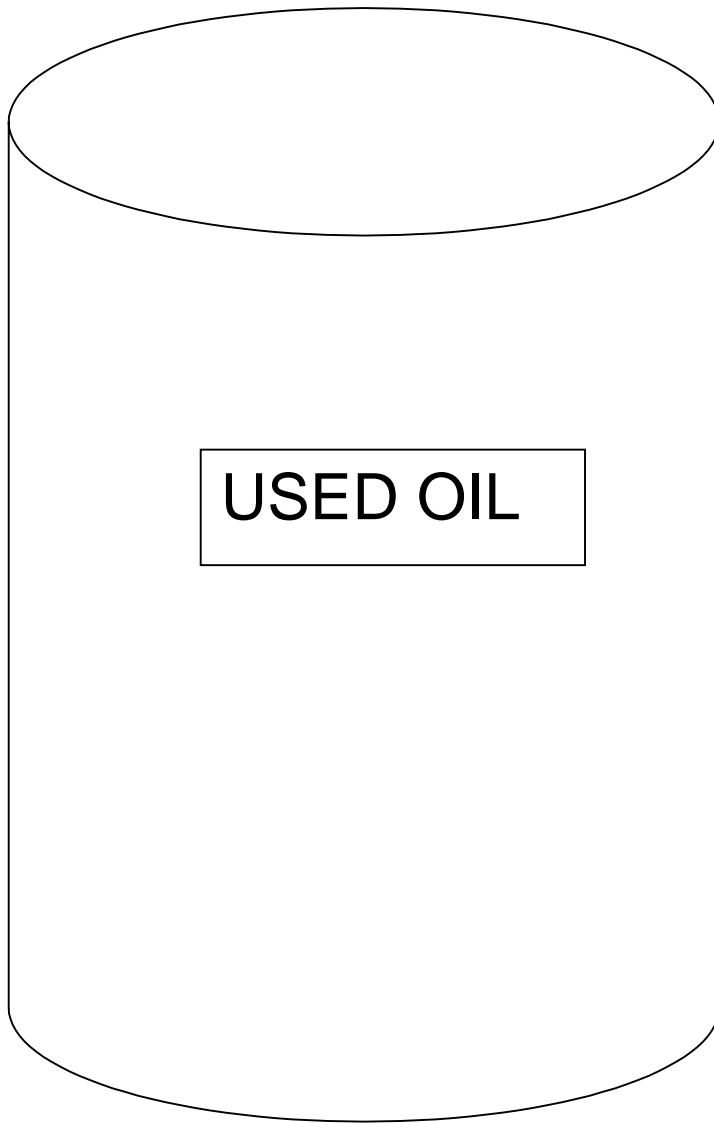
Column 1	Column 2	Column 3
Waste Name	EPA Waste No.	DOT Proper Shipping Name
Battery, Lithium-Sulfur Dioxide, BA-5000 Series (Not completely discharged and type numbers BA-5372/U, BA-5516/U, BA 5567/U)	Universal Waste	See Management guidance memo for recycling batteries (HW Label not required, must use Universal Waste Label)
Battery, Lithium-Thionyl Chloride, BA-6000 Series, Completely Discharged	Universal Waste	See Management guidance memo for recycling batteries (HW Label not required, must use Universal Waste Label)
Battery, Lithium-Thionyl Chloride, BA-6000 Series, Not Completely Discharged	Universal Waste	See Management guidance memo for recycling batteries (HW Label not required, must use Universal Waste Label)
Battery, Mercury, BA-1000 Series	Universal Waste	See Management guidance memo for recycling batteries (HW Label not required, must use Universal Waste Label)
Battery, Magnesium, BA-4000 Series, >8 hours charge remaining	Universal Waste	See Management guidance memo for recycling batteries (HW Label not required, must use Universal Waste Label)
Aerosol Can Residue	D001	Waste Paint Related Material, 3, UN1263, PGIII

WASTE IDENTIFICATION TABLE FOR COMMONLY GENERATED WASTES

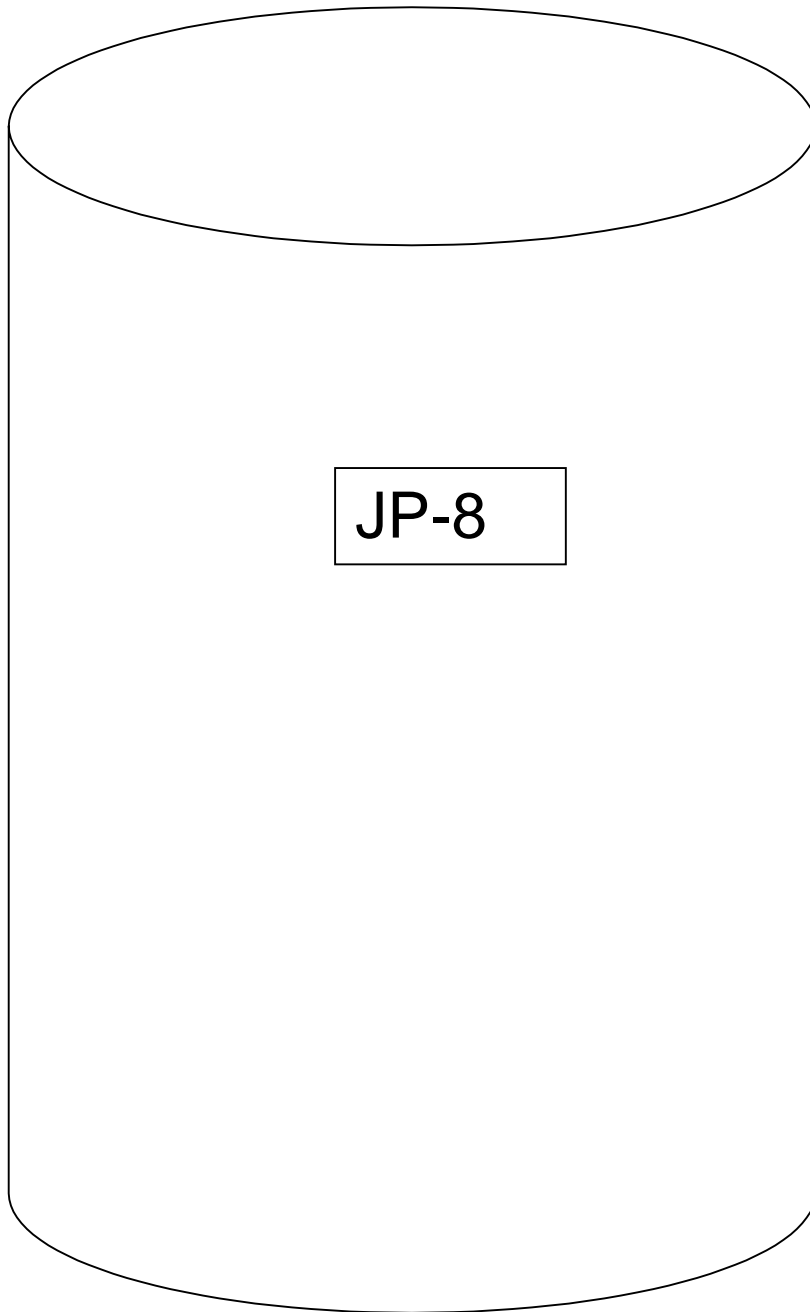
Column 1	Column 2	Column 3
Waste Name	EPA Waste No.	DOT Proper Shipping Name
Aerosol Cans (not evacuated)	D001	Waste Aerosol, Flammable, 2.1, UN1950, PGII
Battery, Nickel-Cadmium (NI-CD), BB-XXX series	Universal Waste	See Management guidance memo for recycling batteries (HW Label not required, must use Universal Waste Label)
Battery, Thermal, BA-605/U, BA-617/U, BA-618/U, BA-630/U	Universal Waste	See Management guidance memo for recycling batteries (HW Label not required, must use Universal Waste Label)
Waste Adhesive	D001	Waste Adhesive, 3, UN1090, PGII
Waste Adhesive containing Toluene	D001	Waste Flammable Liquid NOS (Toluene), 3, UN 1993, PGII (Adhesive)
Waste Adhesive containing Naphtha	D001	Waste Flammable Liquid NOS (Naphtha), 3, UN 1993, PGII (Adhesive)
Waste Adhesive (Other formulations)	Specific to type check with EPMB or Profile sheet	Shipping name specific to different types of Adhesives, consult with EPMB or use description on Waste Profile Sheet
Alcohol, Denatured	D001	Denatured Alcohol, 3, NA1986, PGII
Calcium Hypochlorite (Chlorination kits)	D001	Waste Calcium Hypochlorite, Dry, 5.1, UN1748, PGII
Calcium Hypochlorite	D001	Waste Calcium Hypochlorite, Wet, 5.1, UN2880, PGII
Dry Cleaning Solvent, Stoddard Solvent	D001	Waste Petroleum Distillates, 3, UN1268, PGIII
DS-2	D002	Waste Corrosive Liquids, NOS (Sodium Hydroxide) 8, UN1760, PGII
Fluorescent Bulbs	Universal Waste	See Management guidance memo for recycling fluorescent bulbs (HW Label not required, must use Universal Waste Label)
Filters, Gas Mask	D007	Hazardous Waste Solid, NOS, (Chromium), 9, NA3077, PGIII
Filter, Fuel	D001	Waste Flammable Solid, NOS, 4.1, UN1325, PG II, Organic
Decon Kits (M258, M229, M8, M272, M256, M258A1)	Specific to type check with EPMB or Profile sheet	Shipping name specific to different types of kits, consult with EPMB or use description on Waste Profile Sheet
Methanol	D001	Waste Methanol, Flammable, 3, UN1230, PGII
Waste Paint	Specific to type check with EPMB or Profile sheet	Waste Paint Related Material, 3, UN1263, PGIII
Waste Solvents	Specific to type check with EPMB or Profile sheet	Shipping name specific to different types of solvents, consult with EPMB or use description on Waste Profile Sheet

C-4

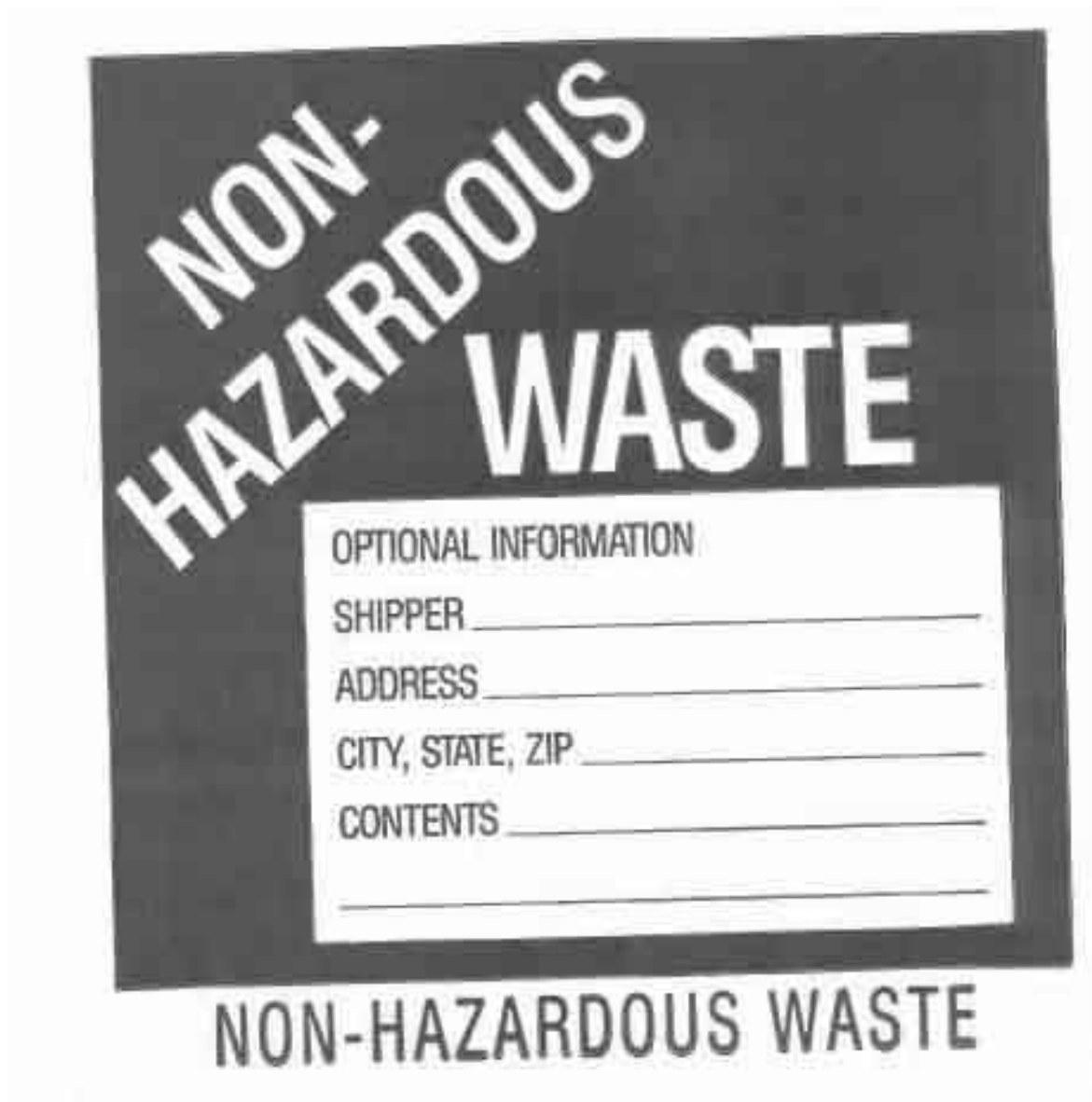
Used Oil Marking



JP-8 Marking



Non-Hazardous Waste Label



A black and white template for a Non-Hazardous Waste Label. The label is rectangular with a dark background. The words "NON-HAZARDOUS WASTE" are printed in large, bold, white capital letters, slanted diagonally from the top left to the bottom right. In the center of the label, there is a white rectangular box containing the text "OPTIONAL INFORMATION" in bold capital letters. Below this text are four horizontal lines for handwritten information, labeled "SHIPPER", "ADDRESS", "CITY, STATE, ZIP", and "CONTENTS" in bold capital letters. At the bottom of the label, the words "NON-HAZARDOUS WASTE" are printed again in bold capital letters, horizontally.

NON-HAZARDOUS WASTE

OPTIONAL INFORMATION

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____

CONTENTS _____

NON-HAZARDOUS WASTE

Universal Waste Labels: Fluorescent Bulbs & Batteries

Label for used bulb containers

**USED MERCURY-
CONTAINING LAMPS**

DO NOT PLACE IN ANY TRASH CONTAINER

**Turn bulbs in to the CHMCC at Bldg. 377 for
RECYCLING. Turn-in must include 1348-1 with fund
cite for costs.**

Organization:_____

Building No._____

Accumulation Start Date:_____

POC:_____ **Phone #**_____

Fluorescent bulbs must be turned-in within 9 months of
generation.

HANDLE WITH CARE!

Label for used battery containers

USED BATTERIES

(description of battery type)

DO NOT PLACE IN ANY TRASH CONTAINER

Turn batteries in to the CHMCC at Bldg. 377 for
RECYCLING. Turn-in must include 1348-1 with fund
cite for costs.

Organization: _____

Building No. _____

Accumulation Start Date: _____

POC: _____ Phone # _____

Used Batteries must be turned-in within 9 months of
generation.

HANDLE WITH CARE!

APPENDIX D

1. EXAMPLE SATELLITE ACCUMULATION POINT (SAP)
2. UNIVERSAL WASTE ACCUMULATION AREA

EXAMPLE SATELLITE ACCUMULATION POINTS

HAZARDOUS WASTE
SATELLITE
ACCUMULATION POINT
1
WASTE PAINT

ENVIRONMENTAL POCs
SECO: MAJ BROWN
545-8888

EC: SFC BLUE
545-4444

HWM: SPC BLACK
545-3333
(AFTER HOURS CONTACT SDNCO 545-6666 FOR ACCESS)

Hazardous Waste
(Completed Yellow
and Red HW
Label)
Paint Waste
D001

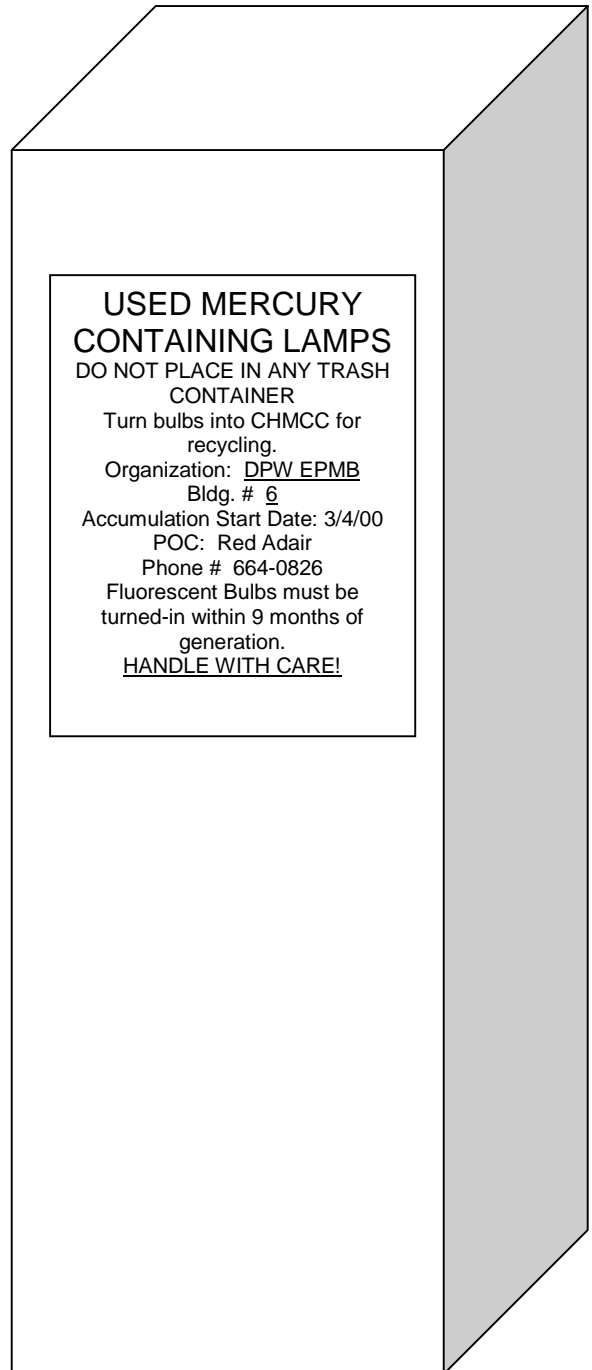
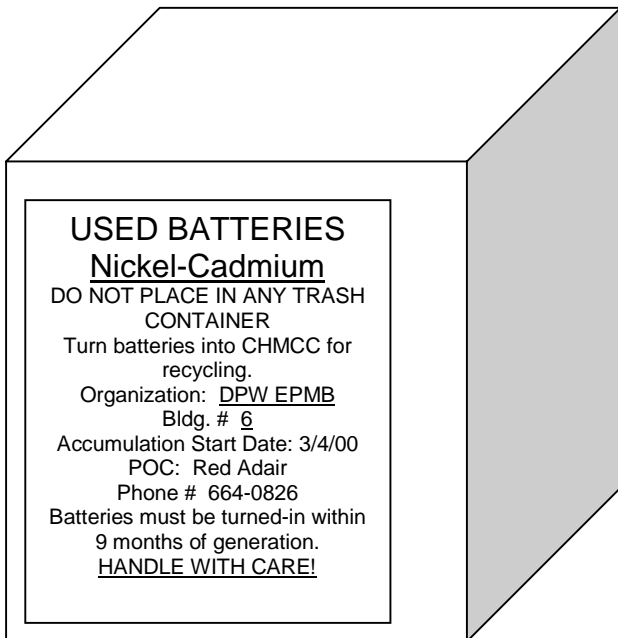
HAZARDOUS WASTE
SATELLITE
ACCUMULATION
POINT #2
M-2 Canister Filters

(secondary containment)

Hazardous Waste
(Completed Yellow
and Red HW Label)
M-2 Canister
(Chromium D007)

D-2

UNIVERSAL WASTE ACCUMULATION AREA



APPENDIX E POL CONTAMINATED WASTE MANAGEMENT GUIDANCE

DEPARTMENT OF THE ARMY
HEADQUARTERS UNITED STATES ARMY INFANTRY CENTER
FORT BENNING, GEORGIA 31905-5000

REPLY TO
ATTENTION OF

ATZB-PWN-P (200)

28 FEB 2000

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Updated Waste Management Guidance

1. The purpose of this memorandum is to provide updated guidance concerning the proper management of three commonly generated wastes at Fort Benning. The wastes include Dry-Sweep/absorbants, (used to clean up petroleum, oil and lubricants (POL) spills), oil filters that have been drained and crushed, and waste rags contaminated with POL.

2. This disposal guidance, for the subject wastes, supercedes that previously set forth in the Fort Benning Hazardous Waste Management Plan, guidance memoranda and guidance handbooks. This guidance applies only to disposal requirements and does not alleviate or change the current requirements for spill reporting.

3. Dry-sweep/absorbants contaminated with POL may be disposed of as solid waste using the following control procedures:

a. The generating unit/organization must certify that the waste is contaminated with POL only, and that the waste does not meet any of the characteristics of a hazardous waste as set forth in 40 Code of Federal Regulations (CFR) Part 261. The unit must have either analytical data less than one year old (analysis should include RCRA metals and flashpoint) or written certification of user knowledge to validate that the waste is non-hazardous.

b. The waste must be double bagged in 2 plastic bags, taped shut at the top and labeled or marked as "NON-HAZARDOUS WASTE, DRY SWEEP CONTAMINATED WITH POL". The waste must not contain any free liquid.

ATZB-PWN-P

SUBJECT: Updated Waste Management Guidance

c. The waste must be turned-in to the unit Hazardous Waste Manager (HWM). The HWM will then verify that the waste meets disposal criteria. The HWM will keep a log of the approximate amounts and dates the waste is disposed. The waste may then be disposed by the HWM in the unit's solid waste dumpster.

d. If the above procedures are not followed, and uncontrolled waste dry sweep/absorbents contaminated with POL are observed in the dumpsters, a notice of non-compliance will be issued to the unit.

4. Oil Filters that have been drained and crushed in accordance with 40 CFR 261.4 may be disposed of as solid waste using the following control procedures:

a. The waste must be double bagged in 2 plastic bags, taped shut at the top and labeled or marked as "CRUSHED, DRAINED OIL FILTERS".

b. The waste must be turned in to the unit HWM. The HWM will then verify that the waste meets disposal criteria. The HWM will keep a log of the approximate amounts and dates the waste is disposed. The waste may then be disposed by the HWM in the unit's solid waste dumpster.

c. If the above procedures are not followed, and uncontrolled oil filters are observed in the dumpsters, a notice of non-compliance will be issued to the unit.

5. Used rags contaminated with POL may be disposed of as solid waste using the following control procedures:

a. The generating unit/organization must certify that the waste is contaminated with POL, only, and that the waste does not meet any of the characteristics of a hazardous waste as set forth in 40 Code of Federal Regulations Part 261. The unit must have either analytical data less than one year old (analysis should include RCRA metals, F-series solvents, and flashpoint) or written certification of user knowledge to validate that the waste is non-hazardous.

ATZB-PWN-P

SUBJECT: Updated Waste Management Guidance

b. The waste must be double bagged in 2 plastic bags, taped shut at the top and labeled or marked as "NON-HAZARDOUS WASTE, RAGS CONTAMINATED WITH POL". The waste must not contain any free liquid.

c. The waste must be turned in to the unit HWM. The HWM will then verify that the waste meets disposal criteria. The HWM will keep a log of the approximate amounts and dates the waste is disposed. The waste may then be disposed by the HWM in the unit's solid waste dumpster.

d. If the above procedures are not followed, and uncontrolled rags contaminated with POL are observed in the dumpsters, a notice of non-compliance will be issued to the unit.

6. Contact the POC for further clarification and guidance pertaining to these disposal options.

7. POC: Wendy G. Duffy, Hazardous Waste Program Manager, DPW Environmental Programs Management Branch, 545-4218.

[Signed]

R. O. BUCK
Colonel, EN
Director of Public Works

DISTRIBUTION: ADMIN-L

APPENDIX F BATTERY MANAGEMENT GUIDANCE

DEPARTMENT OF THE ARMY
HEADQUARTERS UNITED STATES ARMY INFANTRY CENTER
FORT BENNING, GEORGIA 31905-5000

REPLY TO
ATTENTION OF

ATZB-PWN-P (200)

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Management and Recycling of Batteries

1. The purpose of this memorandum is to provide updated guidance concerning the proper management of various types of batteries generated at Fort Benning. This guidance is provided in response to the promulgation, by the State of Georgia Environmental Protection Division (GA EPD), of reduced management requirements for batteries that are recycled. This guidance does not apply to alkaline type batteries, which are considered non-hazardous and may be disposed as normal solid waste. This guidance does not apply to lead acid batteries that are recycled. This guidance is applicable to batteries that have historically been managed as hazardous waste to include, nickel cadmium batteries, mercury batteries, magnesium batteries, and lithium batteries that do not have a discharge device.

2. This disposal guidance, for the subject wastes, supercedes that previously set forth in the Fort Benning Hazardous Waste Management Plan, guidance memoranda and guidance handbooks. Various types of batteries have historically been managed as hazardous waste due to the presence of mercury, chromium, or cadmium greater than regulatory levels or due to the characteristic of reactivity. The State of Georgia has promulgated new regulations, Chapter 391-3-11-.18 Standards for Universal Waste Management, which are less stringent than the hazardous waste management requirements.

3. Following is general guidance for the proper management of used batteries in compliance with the GA EPD regulations.

ATZB-PWN-P (200)

SUBJECT: Management and Recycling of Used Batteries

a. Used batteries must be collected in a manner that prevents releases of waste to the environment. The batteries should be collected in the same type of container in which they are received or other strong secure containers. The areas where the batteries are collected are no longer considered hazardous waste Satellite Accumulation Points (SAPs). Installation Units/Organizations may maintain a single accumulation area (or multiple locations if more practical) for the collection of used batteries.

b. The used battery accumulation area must be managed by personnel who have received appropriate training. The DPW Hazardous Waste Managers Class, offered twice a month, will meet this training requirement. To schedule personnel for training contact POC listed below.

c. Accumulation containers for used batteries must be labeled with the words "USED BATTERIES" and a description of the type of battery (such as "Nickel-Cadmium Battery") and dated with the date collection began (see attached label example). The containers must be maintained securely closed. Containers must be turned in to the Central Hazardous Materials Control Center (CHMCC) within 9 months of the date collection began.

d. When the box is full of used batteries or the 9-month time limit has been reached, the container must be securely closed and turned in to the CHMCC for ultimate recycling.

e. The used batteries must be turned in utilizing a 1348-1 containing a unit specific fund cite for the recycling costs. Installation units are responsible for the payment of management costs.

f. Batteries that are leaking, broken or exhibit a cracked casing should be managed as a hazardous waste. Contact POC below for guidance.

4. Contact the POC for further clarification and guidance pertaining to the proper management of used batteries.

ATZB-PWN-P (200)

SUBJECT: Management and Recycling of Used Batteries

5. POC: Wendy G. Duffy, Hazardous Waste Program Manager, DPW Environmental Programs Management Branch, 545-4218.

[SIGNED]

KEITH A. STELZER
Colonel, EN
Director of Public Works

DISTRIBUTION: CDR, 3d Bde, 3d IN Div

CDR, 75th Rgr Regt

CDR, 36th Engr Gp

CDR, ITB

CDR, BCT Bde

CDR, RTB

CDR, 29th IN Regt

CDR 11th IN Regt

CDR, MEDDAC

CDR, DENTAC

CDR, AMU

CDR, MPA/DPS

Comdt, USARSA

CPAC/DCP

DOL

DCA

AG/DMP

DOIM

DOT

Ch, DBBL

Comdt, NCOA

AAFES

Commander, 17th ASOS

CDR, 718th Engineer Detachment

DOD Schools

AMIN L

Label for used battery containers

USED BATTERIES

(description of battery type)

DO NOT PLACE IN ANY TRASH CONTAINER

Turn batteries in to the CHMCC at Bldg. 377 for
RECYCLING. Turn-in must include 1348-1 with fund
cite for costs.

Organization: _____

Building No. _____

Accumulation Start Date: _____

POC: _____ Phone # _____

Used Batteries must be turned-in within 9 months of
generation.

HANDLE WITH CARE!

APPENDIX G FLUORESCENT BULB MANAGEMENT GUIDANCE

DEPARTMENT OF THE ARMY
HEADQUARTERS UNITED STATES ARMY INFANTRY CENTER
FORT BENNING, GEORGIA 31905-5000

REPLY TO
ATTENTION OF

ATZB-PWN-P (200)

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Management and Recycling of Fluorescent Bulbs

1. The purpose of this memorandum is to provide updated guidance concerning the proper management of used fluorescent bulbs and other mercury containing lamps. This guidance is being provided in response to the promulgation by the State of Georgia Environmental Protection Division (GA EPD) of reduced management requirements for fluorescent bulbs that are being recycled. This guidance does not apply to low mercury fluorescent bulbs designated with green writing or have green ends. The green tip/writing, low mercury bulbs are manufactured by General Electric (GE) and Phillips and may be disposed of as normal solid waste.

2. This disposal guidance, for the subject wastes, supercedes that previously set forth in the Fort Benning Hazardous Waste Management Plan, guidance memoranda and guidance handbooks. Fluorescent bulbs have historically been required to be managed as hazardous waste due to the presence of mercury greater than regulatory levels. The State of Georgia has promulgated new regulations, Chapter 391-3-11-.19 Standards for Waste Mercury-Containing lamps, which are less stringent than the hazardous waste management requirements.

3. Following is general guidance for the proper management of waste mercury containing lamps in compliance with the GA EPD regulations.

a. Used fluorescent bulbs must be collected in a manner that prevents breakage. The bulbs should be collected in the same type of container in which new bulbs are received. The areas where the fluorescent bulbs are collected are no longer considered hazardous waste Satellite Accumulation Points (SAPs). Installation Units/Organizations may maintain a single accumulation area (or multiple locations if more practical) for the collection of waste fluorescent bulbs.

ATZB-PWN-P (200)

SUBJECT: Management and Recycling of Fluorescent Bulbs

b. The used fluorescent bulb accumulation area must be managed by personnel who have received appropriate training. The DPW Hazardous Waste Managers Class, offered twice a month, will meet this training requirement. To schedule personnel for training contact POC listed below.

c. Containers of used bulbs must be labeled "USED MERCURY-CONTAINING LAMPS" and dated with the date collection began (see attached label example). The containers must remain securely closed. Containers must be turned in to the Central Hazardous Materials Control Center (CHMCC) within 9 months of the date collection began.

d. When the box is full of used bulbs or the 9-month time limit has been reached, the container must be securely closed and turned in to the CHMCC for ultimate recycling.

e. The used bulbs must be turned in utilizing a 1348-1 containing a unit specific fund cite for the recycling costs. Installation units are responsible for the payment of management costs.

f. Broken fluorescent bulbs may also be managed in accordance with this guidance with the following additional requirements. The broken bulbs must be securely containerized separately from unbroken bulbs, and the label must provide written notation that the contents are broken bulbs.

4. Contact the POC for further clarification and guidance pertaining to these disposal options.

5. POC: Wendy G. Duffy, Hazardous Waste Program Manager, DPW Environmental Programs Management Branch, 545-4218.

[SIGNED]

KEITH A. STELZER
Colonel, EN
Director of Public Works

ATZB-PWN-P (200)

SUBJECT: Management and Recycling of Fluorescent Bulbs

DISTRIBUTION: CDR, 3d Bde, 3d IN Div

CDR, 75th Rgr Regt

CDR, 36th Engr Gp

CDR, ITB

CDR, BCT Bde

CDR, RTB

CDR, 29th IN Regt

CDR 11th IN Regt

CDR, MEDDAC

CDR, DENTAC

CDR, AMU

CDR, MPA/DPS

Comdt, USARSA

CPAC/DCP

DOL

DCA

AG/DMP

DOIM

DOT

Ch, DBBL

Comdt, NCOA

AAFES

Commander, 17th ASOS

CDR, 718th Engineer Detachment

DOD Schools

ADMIN L

Label for used bulb containers

USED MERCURY- CONTAINING LAMPS

DO NOT PLACE IN ANY TRASH CONTAINER

**Turn bulbs in to the CHMCC at Bldg. 377 for
RECYCLING. Turn-in must include 1348-1 with fund
cite for costs.**

Organization:_____

Building No._____

Accumulation Start Date:_____

POC:_____ **Phone #**_____

Fluorescent bulbs must be turned-in within 9 months of
generation.

HANDLE WITH CARE!

APPENDIX H STRUCTURE FOR ENVIRONMENTAL MANAGEMENT POLICY

ATZB-PWN (200)

24 NOV 96

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Designation and Training of Environmental Compliance Officers
(ECO)

1. References:

a. Final draft AR 200-1, 6 May 1996, Environmental Protection and Enhancement.

b. Garrison Commander E-Mail message, 9 Oct 96, Subject: Environmental Compliance

c. DPW E-Mail message, 18 Oct 96, Subject: ECO Training.

2. Per reference b, the Commanding General has directed that Environmental Compliance Officers (ECO) be appointed and trained at appropriate organizational levels to ensure that all units and activities, to include all tenants, on Fort Benning comply with environmental laws and regulations.

3. Per references a and b, the designation of unit and activity ECOs will be as follows:

a. Units:

- | | |
|---------------------------|-----------------------|
| (1) Brigade/Regiment ECO: | Field Grade Officer |
| (2) Battalion ECO: | Field Grade Officer |
| (3) Company ECO | Officer or Senior NCO |

b. Directorates and all other activities:

- | | |
|----------------------|---|
| (1) Directorate ECO: | Director, Deputy Director, or
Division Chief |
| (2) Division ECO: | GS/WG/Senior NCO |
| (3) Branch ECO: | GS/WG/NCO |

c. Appointment of division-level ECOs is required if the division produces or handles hazardous materials or hazardous waste. The appointment of branch-level ECOs is required if the branch generates hazardous waste. The appointment of ECOs for all other subordinate elements will be done at the discretion of the director.

4. All unit and activity ECOs will be appointed in writing. One copy of the appointment memorandum will be forwarded to the Environmental Programs Management Branch (EPMB), Environmental Management Division (EMD), Directorate of Public Works (DPW). Commanders and supervisors should make every effort to appoint individuals who will serve as ECO for at least one year.

5. The primary role of the ECO is to oversee the commanders or directors environmental program, and to provide guidance and direction to the Environmental Coordinator (EC). The EC retains the function of managing the day-to-day environmental functions such as training personnel, inspecting unit areas, maintaining the required documentation, etc. At division and branch levels, the ECO and EC can be the same individual.

6. Training required for Senior level ECOs is the 4- Hour SECO Training Course conducted quarterly by EPMB. For dates and times contact POC below.

7. POC: Wendy G. Duffy, DPW EPMB, 545-4218.

FOR THE COMMANDER:

[signed]
BYRON D. GREENE III
Colonel, Infantry
Garrison Commander

APPENDIX I SAP ACCESS GUIDANCE

DEPARTMENT OF THE ARMY
HEADQUARTERS UNITED STATES ARMY INFANTRY CENTER
FORT BENNING, GEORGIA 31905-5000

REPLY TO
ATTENTION OF

ATZB-PWN-P (200)

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: United States Environmental Protection Agency, Multi-Media
Inspection, Follow-Up

1. References:

a. Pursuant to the Georgia Hazardous Waste Management Act, the Rules, Chapter 391-3-11 Section 12 (3) and 40 Code of Federal Regulations, each inspection shall be commenced and completed with reasonable promptness.

b. During the United States Environmental Protection Agency(EPA) Multi-Media Inspection, a violation of the referenced section of the rules was determined at two Fort Benning locations.

2. Mr. Ted Williams, Hazardous Waste Technician, Directorate of Public Works (DPW) Environmental Management Division (EMD), conducted a follow-up inspection at two unit locations on 2 July, 1999. The inspection was conducted at the request of the Garrison Commander. The purpose of the inspection was to verify whether the units could provide access to the hazardous waste accumulation areas within a reasonable amount of time. Following is an account of the inspection.

4. Inspection revealed access was not provided and was not readily available at either location. Effort was made by Mr. Williams to use contact numbers provided by the units and he also went to the Staff Duty Offices associated with each location to determine if keys were available. Both strategies to obtain access proved unsuccessful. This is a violation of the referenced state and federal regulations. This type of violation has a strong potential to result in an administrative action such as a Consent Order and possibly a fine if it were noted during a state or federal inspection.

ATZB-PWN-P

SUBJECT: United States Environmental Protection Agency, Multi-Media
Inspection, Follow-Up

5. In order to alleviate this potentially deleterious situation throughout Fort Benning, a written unit policy must be developed and put into effect requiring that keys to any areas where hazardous waste is accumulated (Satellite Accumulation Points and Central Accumulation Points) be provided (and properly labeled by location) to the organizational Staff Duty Office. Provide telephonic or E-mail confirmation to the POCs listed below indicating that this policy has been developed and put into effect NLT 31 August 1999.

6. POC: Ms. Wendy Duffy, duffyw@benning.army.mil, 545-4218, Hazardous Waste Program Manager, or Mr. Ted Williams, williamst@benning.army.mil, 545-7580, Hazardous Waste Technician, Environmental Programs Management Branch, DPW.

[signed]

R.O. BUCK
Colonel, EN
Director of Public Works

DISTRIBUTION:

CDR, 3d Bde, 3d IN Div
CDR, 75th Rgr Regt
CDR, 36th Engr Gp
CDR, ITB
CDR, BCT Bde
CDR, RTB
CDR, 29th IN Regt
CDR, 11th IN Regt
CDR, MEDDAC
CDR, DENTAC
CDR, AMU
CDR, MPA/DPS
Comdt, USARSA
DOT
Comdt, NCOA
CDR, 17th Air Spt Ops Sq
CDR, 718th Engineer Detachment

APPENDIX J SAP MANAGEMENT GUIDANCE



DEPARTMENT OF THE ARMY
HEADQUARTERS UNITED STATES ARMY INFANTRY CENTER
FORT BENNING, GEORGIA 31905-5000

REPLY TO
ATTENTION OF

ATZB-PWN-P (200)

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Georgia Environmental Protection Division Hazardous
Waste Satellite Accumulation Point Management Guidance

1. The purpose of this memorandum is to provide guidance for the proper management of Hazardous Waste (HW) Satellite Accumulation Points (SAPs). This guidance has been developed based upon recommendations provided by the Georgia Environmental Protection Division (GA EPD) subsequent to the United States Environmental Protection Agency (EPA)/GA EPD Multi-Media Inspection. The recommendation was stated as part of an Issue of Concern noted in the GA EPD Compliance Evaluation Inspection Report, July 12, 1999, relating to the management of HW SAPs.

2. State and Federal regulations state that the total volume of Hazardous Waste at an individual HW SAP shall not exceed 55 gallons. During the inspection, the regulator noted that within SAPs at eight locations, it was unclear whether the 55-gallon regulatory limit had been exceeded because the combined volumes of the containers labeled "Hazardous Waste" exceeded 55-gallons.

3. In order to prevent the potential to exceed 55-gallons from occurring, and possibly a violation of the regulations, the following management measures must be implemented:

a. Each type of hazardous waste (waste stream) generated in a work area should be managed in a separate SAP.

b. Each SAP must have a sign posted above the container with the words "Hazardous Waste Satellite Accumulation Point" and a description of the waste being accumulated, such as "Paint Waste", "Aerosol Cans" or "Fluorescent Bulbs". The sign can be as simple as a piece of paper taped on the wall above the container with the correct information.

c. Two 55-gallon drums containing two different waste streams may be located on the same pallet as long as there are two separate signs containing the information specified in (b.) above and the SAPs are clearly defined as separate. For example they may be shown as "SAP 1" and "SAP 2".

ATZB-PWN-P (200)

SUBJECT: Georgia Environmental Protection Division Hazardous Waste Satellite Accumulation Point Management Guidance

d. The total volume of containers within a SAP must not be more than 55 gallons. This prevents the potential to exceed 55 gallons from occurring. A SAP may have one 55 gallon drum only, or one 25 gallon drum and one 30 gallon drum in combination or other combinations of appropriate containers as long as they do not total in capacity or volume 55 gallons.

e. Containers must have a red and yellow Hazardous Waste Label, properly completed with the generating unit's full address, phone number, installation EPA ID number, DOT Shipping Name, and the EPA hazardous waste identification code. The common waste name must also be either included on the bottom of the label or marked on the container.

f. A copy of a properly completed label should be posted above the SAP to provide a consistent and correct example of a label.

g. A Hazardous Waste Manager (HWM) must be appointed on orders and receive HW Training annually, as provided by EPMB. The HWM must inspect the SAP weekly using FB Form 46. Training and inspection records must be maintained for three years.

h. Containers in SAPs must be kept securely closed when waste is not being added.

i. Once a container is full and closed for the last time, the accumulation start date must be written on the Hazardous Waste Label. The generator then has 72 hours to turn the container in to a 90-Day Central Accumulation Point or the Central Hazardous Material Control Center using Form 1348-1. A copy of the Form 1348-1 (Turn-in document) must be maintained for 3 years.

4. This guidance shall be completely and directly applied to all HW SAPs located throughout Fort Benning. Implementation of these measures will enhance the compliance status of the SAPs and will ensure SAP management consistency throughout Fort Benning.

5. Hazardous Waste Management Training classes are offered monthly for personnel maintaining hazardous waste SAPs (HWM). To enroll in the class or obtain additional information, contact the following POCs.

ATZB-PWN-P (200)

SUBJECT: Georgia Environmental Protection Division Hazardous Waste Satellite
Accumulation Point Management Guidance

6. POC: Ms. Wendy Duffy, 545-4218, Hazardous Waste Program Manager, Mr.
Tom Tuten, 545-7580, Hazardous Waste Technician, or Mr. Ted Williams, 545-
7579, Hazardous Waste Technician, Environmental Programs Management Branch,
DPW.

R.O. BUCK
Colonel, EN
Director of Public Works

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APPENDIX K JP-8 MANAGEMENT GUIDANCE

DEPARTMENT OF THE ARMY
HEADQUARTERS UNITED STATES ARMY INFANTRY CENTER
FORT BENNING, GEORGIA 31905-5000

REPLY TO
ATTENTION OF

ATZB-PWN-P (200)

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Guidance for the Management of Excess JP-8 from Maintenance Activities

1. The purpose of this memorandum is to provide written guidance for the proper management of excess JP-8 generated from vehicle maintenance activities.
2. Excess JP-8 generated from the subject activities is considered an off-specification product and therefore, is managed as a product to be used for its intended purpose in accordance with 40 Code of Federal Regulations 261.2[c][2][ii]. The product usage for the excess JP-8 is as a fuel for the boilers located at the Fort Benning Central Heat Plant on Main Post. The Fort Benning Air Permit allows JP-8 to be burned as fuel in the boilers
3. In order for the JP-8 to be considered an off specification product, the following management measures must be taken:
 - a. Generators are strictly forbidden from mixing other hazardous materials, hazardous wastes, antifreeze or anything else in with the JP-8.
 - b. Excess JP-8 must be placed in a container that is in good condition and is compatible with JP-8. Typically, a steel drum is used for this purpose.
 - c. The container must be labeled, at a minimum as "JP-8", do not label as "waste" or "used".
 - d. The container must be kept closed when not directly adding JP-8 to it.
 - e. The container must be stored in an area away from drains and some type of secondary containment must be provided to ensure leaks, drips or spills do not enter the environment. Spill response materials must be available in the accumulation area.

ATZB-PWN-P (200)

SUBJECT: Guidance for the Management of Excess JP-8 from Maintenance Activities

f. Containers must be properly sealed and secured on vehicles for transport to the Central Heat Plant.

4. POC: Ms. Wendy Duffy, 545-4218, Hazardous Waste Program Manager, or Mr. Ted Williams, 545-7580, Hazardous Waste Technician, Environmental Programs Management Branch, DPW.

[signed]

R.O. BUCK
Colonel, EN
Director of Public Works

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APPENDIX L SPILL FORMS

1. RESPONSE PROCEDURES
2. SPILL REPORTING FORM

SPILL PROCEDURES

1. **Immediately** Notify Your Area Supervisor of the Spill
2. Identify what was spilled and estimate the quantity spilled
3. **Notify 911 of the spill.**
4. **If the spill is minor and it is safe to proceed,** contain the spill with absorbent and begin cleanup.
5. **If safe,** take defensive measures, such as blocking nearby drains.
6. **If there is a safety hazard,** evacuate personnel and secure area until help arrives.
7. Record all information regarding spill incident on Spill Reporting Form.
8. Submit Spill Report to EPMB (FAX 5-4209)

SPILL RESPONSE RECORD

PHASE I - IMMEDIATE ACTIONS FOR EVALUTING AND REPORTING SPILLS:

IMMEDIATELY REPORT ALL SPILLS TO YOUR SUPERVISOR AND CALL 911

****BE PREPARED TO PROVIDE THE FOLLOWING INFORMATION TO 911 OPERATOR:**

During Duty Hours also Call Mr. Felix Seda, EPMB Spill Manager at 545-9879

1. DATE/TIME OF SPILL: _____ / _____

2. LOCATION: _____

3. MATERIAL SPILLED (include NSN and ingredients, if able): _____

4. HAZARD: FLAMMABLE _____ TOXIC _____ CORROSIVE _____
OXIDIZER _____ REACTIVE _____ UNKNOWN _____
OTHER (specify) _____

5. CAUSE OF SPILL: _____

6. DESCRIPTION OF SPILL QUANTITY, SIZE AND TYPE OF AREA AFFECTED:

- a. Quantity Released and Size of Spill Area: _____
- b. Soil: _____
- c. Pavement: _____
- d. Vegetation: _____
- e. Storm or Sewer Drain: _____
- f. Name of Body of Water (River, Creek, Pond, Lake, Drainage Ditch): _____

7. HAS RELEASE BEEN STOPPED? _____

8. HAS RELEASE BEEN CONTAINED? _____

9. DID RELEASE CROSS INSTALLATION BOUNDARIES? (IF YES, DESCRIBE LOCATION) _____

10. TYPE AND EXTENT OF INJURIES, IF ANY: _____

****Provide a copy of this for to DPW EPMB Spill Program Manager or FAX to 543-4209**

PHASE II - POST-SPILL RESPONSE AND CLEAN UP ACTIONS:

11. DESCRIBE CLEAN-UP METHOD AND CONTAINMENT PROCEDURES: _____

12. NAME OF CONTRACTOR INVOLVED IN CLEAN-UP: _____

13. ESTIMATED AMOUNT OF SPILL RESIDUE AND CONTAMINATED MATERIAL REMOVED: _____

14. ESTIMATED COST OF CLEAN-UP: _____

15. CORRECTIVE ACTION TAKEN OR TO BE TAKEN TO PREVENT FUTURE SIMILAR INCIDENTS: _____

16. NAME AND PHONE NUMBER OF PERSONNEL REPORTING SPILL: _____

****KEEP THIS FORM FOR A MINIMUM OF THREE YEARS**

APPENDIX M

COMMON HAZARDOUS WASTES (Turn-in to CHMCC)

- Fluorescent Bulbs (excluding Green Tipped Bulbs, bulbs w/green writing, and the bulbs used with the new fixtures recently installed under the energy conservation contract)
- Metal Halide and Sodium Vapor Bulbs
- Aerosol Cans
- Paint (CARC and Enamel, Lacquer)
- Batteries (Nickel Cadmium, Mercury, Lithium, Magnesium)
- Used Solvents (Methyl Ethyl Ketone, Xylene, Acetone, Toluene, Methylene Chloride)
- Paint Thinner
- Contaminated Fuel (Diesel, Mogas, JP-8)
- Super Tropical Bleach
- NBC mask filters
- Fuel Filters
- Residue from clean up of HW Spills
- Sodium Hydroxide
- Thermometers, Switches and Thermostats containing Mercury
- Some Expired Shelf Life Materials (Epinephrine/Bee Sting kits, paint, adhesives, solvents, etc.)

WASTES REQUIRING PERIODIC ANALYTICAL TESTING (Turn-in to CHMCC)

- Used Antifreeze
- Weapons cleaning rags, patches and swabs
- Unknown “Orphan” Waste
- Used Parts Washer Solvents
- Sludges

Contact Kathy Webb at DRMO at 545-6027 to make arrangements for testing

Unit is responsible for paying for testing utilizing DD FORM 1348-1 with an approved fund cite

NON-HAZARDOUS WASTES (Turn-in to CHMCC)

- Excess Water based Latex Paint and brushes
- Oil Filters
- Dry-Sweep
- Grease

RECYCLABLE MATERIALS (Contact the MRF at 545-6142 for turn-in)

- Used Oil (Contact DPW Utilities for Turn In)
- Excess JP-8 (vehicle maint, or aircraft operations) (Contact DPW Utilities for Turn In)
- Lead Acid Batteries from Vehicles (contact DOL Supply for Turn-in)
- Aluminum Cans Plastics
- Glass Metal
- Yard Waste Wood
- Cardboard Steel Cans
- All Paper Scrap Metal

SPILL RESPONSE AND REPORTING

Spills of HW, POL and Hazardous Materials must be reported and cleaned up

If assistance is needed CALL 911

M-1

- **Contact Felix Seda at 545-9879 to report ALL spills and submit a spill report**

HAZARDOUS WASTE ACCUMULATION AREA REQUIREMENTS

- Fort Benning has three types of HW Accumulation Areas, **Satellite Accumulation Point (SAP)**, **Central Accumulation Point (CAP)**, and a Permitted Storage Facility at DRMO
- HW Accumulation areas must have an HWM and Alternate appointed on orders
- Weekly inspections must be conducted at all HW accumulation areas and documented on FB Form 46
- HWMs and alternates must receive annual hazardous waste training
- Personnel handling hazardous waste must receive annual training
- Location of accumulation areas must be clearly marked with a sign including emergency phone contacts, and contain a waste inventory
- Turn-in documents, training records, inspection forms and waste profiles/analytical data must be kept for a minimum of three years

1. Satellite Accumulation Points (SAP)

- Must be at the point of generation
- Must not exceed 55 gallons
- Containers must be labeled, kept closed and in good condition
- Once a container is full it must be marked with the date and turned in to a CAP or the CHMCC within 72 Hours

2. Central Accumulation Points (CAP)

- Location must be approved by DPW EPMB
- Containers must be properly labeled including the Accumulation Start Date
- Containers must be kept closed and in good condition
- Accumulation limited to 90-Days (however, waste must be turned in to the CHMCC with at least 10 days of accumulation time left)

SPILL RESPONSE AND REPORTING

- Spills of HW, POL and Hazardous Materials must be reported and cleaned up
- **If assistance is needed CALL 911**
- **Contact Felix Seda at 545-9879 to report ALL spills and submit a spill report**

WASTE TURN-IN

- Units are responsible for all costs associated with waste management including containers, labels, spill response equipment and disposal.
- Waste must be turned in to the CHMCC at Building 377 using DD FORM 1348-1 with an appropriate fund cite.
- Each HW must also have a profile sheet with the turn-in documentation

STRUCTURE FOR MANAGEMENT

Senior Environmental Compliance Officer (SECO)-Field Grade-BDE/REGT/BN Levels

- Require One Time 4-Hour SECO Course

Environmental Compliance Officer (ECO)-Officer or SNCO at Company level

- 8-Hour HWMs Course

Environmental Coordinator-Officer or SNCO-BDE/REGT/BN Levels (8-Hour HWMs Course)

HWM-All HW Accumulation areas (SAPs and CAPs) (8-Hour HWMs Course)

CENTRAL HAZARDOUS MATERIAL CONTROL CENTER (CHMCC) 545-9537

- Central Facility for the management of hazardous materials and wastes
- All wastes indicated above must be turned-in for disposal to the CHMCC
- Excess Materials may turned in to the CHMCC for reissue (both services free to the unit)
- CHMCC provides assistance for units managing waste for disposal

QUESTIONS? Call the DPW EPMB Hazardous Waste Management Team
Wendy Duffy 545-4218 *Ted Williams 545-7579* *Tom Tuten 545-7580*
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APPENDIX N ACRONYM LIST

AR	Army Regulation
ASP	Activity Specific Plan or Ammunition Supply Point
AST	Aboveground Storage Tank
CAP	Central Accumulation Point
CDD	Complete Discharge Devices
CFR	Code of Federal Regulations
CHMCC	Central Hazardous Materials Control Center
DCP	Directorate of Civilian Personnel
DOC	Directorate of Contracting
DOD	Department of Defense
DOL	Directorate of Logistics
DOT	Directorate of Training or Department of Transportation
DPW	Directorate of Public Works
DRMO	Defense Reutilization and Marketing Office
ECO	Environmental Compliance Officer
EOD	Explosive Ordnance Detachment
EPA	Environmental Protection Agency
EPMB	Environmental Programs Management Branch
EQCC	Environmental Quality Control Committee
FB	Fort Benning
HAZCOM	Hazard Communication
HM	Hazardous Materials
HSMS	Hazardous Substance Management System
HWM	Hazardous Waste Manager
HWMP	Hazardous Waste Management Plan
HWPS	Hazardous Waste Profile Sheet
IAW	In Accordance With
ICP	Integrated Contingency Plan
ISCP	Installation Spill Contingency Plan
MMR	Military Munitions Rule
MSC	Major Subordinate Command
MSDS	Material Safety Data Sheet
NCO	Non Commissioned Officer
NSN	National Stock Number
POC	Point of Contact
POL	Petroleum, Oil and Lubricants
RCRA	Resource Conservation and Recovery Act
SAP	Satellite Accumulation Point
SECO	Senior Environmental Compliance Officer
SOP	Standard Operation Procedure
STB	Super Tropical Bleach
TCLP	Toxicity Characteristic Leaching Procedure
TSDF	Treatment, Storage or Disposal Facility
UST	Underground Storage Tank
WMM	Waste Military Munitions

